

COMMENTS ON THE ENVIRONMENTAL PRIORITY INITIATIVE-PRELIMINARY ASSESSMENT REPORT FOR

THE McCORMICK PAINT WORKS COMPANY EPA ID NO. MDD003248275; DUMP SITE NO. MD-398 ROCKVILLE, MARYLAND

> Contract No. 68-W9-0005 (TES VIII) Work Assignment No. R03019

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Contract No. 68-W9-0005 (TES VIII) Work Assignment No. R03019 Project No. P520-R30

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1.0 INTRODUCTION

1.1 AUTHORIZATION

Dynamac Corporation (Dynamac) performed this task under United States Environmental Protection Agency, Contract No: 68-W9-0005 (TES VIII). EPA authorized this task under RCRA Work Assignment No: R03019. Dynamac's task is to perform technical reviews of draft Environmental Priority Initiative Preliminary Assessment (EPI-PA) reports. These EPI-PA reports were previously completed under the authorization of the USEPA Superfund Program.

1.2 PROJECT DESCRIPTION

The following report provides specific comments on the subject EPI-PA report. The comments are based on the information contained in the subject report, Dynamac's technical experience with EPA's, RCRA, CERCLA, and EPI-PA programs, and the resources currently available to Dynamac. Dynamac has attempted to concentrate on the technical aspects of the report as related to the RCRA program; however, comments concerning non-RCRA specific issues that may impact the overall assessment of the facility have been included. The comments have been arranged according to the sections of the report. The comments have been numbered sequentially within each section with text specific comments appearing first and general comments following.

2.0 COMMENTS ON THE EPI-PA REPORT

2.1 COMMENTS ON "1.0 INTRODUCTION"

The final report summary should reflect the modifications to the report in response to the following comments.

Comments on "1.3 Executive Summary"

Comment No. 1

State the RCRA waste number for the spent solvent/paint sludge mixture.

Comment No. 2

If there have been no known releases from the three USTs and they have never been used to store waste products, then they should not be considered a part of SWMU-2.

2.2 COMMENTS ON "2.0 SITE DESCRIPTION"

Comment No. 1

Since MPWC leases warehouses 3 and 4, state the name of the owner(s) of the warehouses.

Comments on "2.1 Site Ownership and Site Use"

Comment No. 2

According to the Appendix A, the site was woodland before it was purchased by Thomas McCormick. This fact should be mentioned in section 2.1.

Comment No. 3

In order to determine if additional SWMUs exist, discuss the operations that take place at the loading dock.

Comment No. 4

Appendix D indicated that MPWC performed a process of solidification in drums of a particular hazardous wastestream prior to shipment off-site. This should be discussed in more detail. The facility is classified as a hazardous waste generator; however, this appendix indicates a "treatment" practice. It should be determined whether or not the facility is operating under the classification of a treatment facility. If so, this facility is/has performed operations other than their RCRA classification as a generator, and would be in possible violation.

2.3 COMMENTS ON "3.0 WASTE DESCRIPTIONS"

Comment No. 1

The report stated that the following wastes were shipped offsite for disposal:

- accumulated sludge classified as waste flammable material
- spent solvents that could not be reused
- hazardous waste solids containing mercury
- used motor oil and antifreeze.

The names and USEPA waste handling I.D. numbers of the facilities that disposed of the above mentioned wastes should be included in this section. Additionally, approximate volumes of waste shipped should be provided.

Comment No. 2

A more complete description of handling procedures for wastes generated in the testing laboratories and spray department is necessary in order to determine if additional SWMUs exist.

Comments on "3.1 Solid Waste Management Units"

Comment No. 3

The sections concerning the solid waste management units should be rewritten in the following format and should include the following information:

Unit Description

- Location of the unit
- Dimensions and physical features of the unit
- Function of the unit (storage, recycling, treatment, etc.)
- Access restrictions to the unit
- Operational permits and permit requirements

Date of Startup

- The date the unit was first used to manage wastes
- The date the unit was first permitted to manage wastes

Date of Closure

- The date the unit was last used to manage wastes
- Whether the unit was closed in accordance with RCRA or state mandated procedures

Waste Managed

- The types including RCRA waste codes, of all the waste streams managed at the unit (include or reference laboratory results)
- The quantities of all waste streams managed at the unit
- The origin of all the waste streams managed at the unit
- The fate of the waste streams upon leaving the unit including the names and identification numbers of all TSD facilities receiving the wastes (include shipping manifests)

Containment Features

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• The primary waste containment features associated with the unit (drums, tanks, impoundments, etc.)

- The secondary waste containment features associated with the unit (floors, berms, liners, etc.)
- The tertiary waste containment features associated with the unit (catch basins, overflow alarms, etc.)

Past Release History

- All known spills or releases associated with the unit
- All known containment violations associated with the unit
- All known remedial actions associated with the unit

Comments on "3.1.1 SWMU 1 - Satellite Accumulation Area"

Comment No. 4

The piping system which transports spent solvents from the second floor of the manufacturing plant to the first floor need to be more completely described.

Comments on "3.1.2 SWMU 2 - Drum Storage Yard"

Comment No. 5

The titanium dioxide dust collection unit needs to be more completely described.

Comments on "3.1.3 SWMU 3 - Recycled Solvent Storage Area"

Comment No. 6

Information detailing whether or not warehouse 3 has any floor drains should be provided.

Comments on "3.1.4 SWMU 4 - Fenced Opén Yard and Parking Lot"

Comment No. 7

Information detailing whether or not SWMU 4 has any type of storm drains or storm water collection apparatus should be provided.

2.4 COMMENTS ON "4.0 SPECIAL CHARACTERISTICS"

Comment No. 1

The location in relation to the site of the weather station from which the weather data was obtained should be included in the narrative.

2.5 COMMENTS ON "5.0 POPULATION DESCRIPTIONS"

No comment.

2.6 COMMENTS ON "6.0 SITE VISITS"

Comments on "6.2 Site Observations"

Comment No. 1

Paragraph four on page 36 states that three solid waste management units were identified. However, Section 3.1 of the report identified four SWMUs.

2.7 COMMENTS ON "7.0 CONCLUSIONS"

No comment.

2.8 COMMENTS ON "8.0 REFERENCES"

No comment.

2.9 COMMENTS ON "9.0 FIGURES"

No comment.

2.10 COMMENTS ON "10.0 PHOTOGRAPHS"

Comment No. 1

Include the name of the photographer, the date and time the photos were taken, and the direction the photos are facing.

ENVIRONMENTAL PRIORITIES INITIATIVE PRELIMINARY ASSESSMENT OF THE MCCORMICK PAINT WORKS COMPANY ROCKVILLE, MARYLAND

(MD-398)

APRIL, 1992

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1.0 INTRODUCTION

1.1 AUTHORIZATION

The Maryland Department of the Environment, Hazardous and Solid Waste Management Administration (MDE/HSWMA) performed this study under U. S. Environmental Protection Agency (USEPA) Cooperative Agreement No. V-003577-01-0.

1.2 SCOPE OF WORK

The MDE/HSWMA was contracted to perform this Environmental Priorities Initiative - Preliminary Assessment (EPI-PA) of the McCormick Paint Works Company (MPWC) site (MD-398) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The potential for the release of hazardous waste from the site is studied; and the consequent potential for exposure by means of migration through the groundwater, surface water and air pathways and direct exposure to the soil is evaluated. The populations and sensitive environments which are located along the potential exposure pathways are then described.

1.3 EXECUTIVE SUMMARY

The McCormick Paint Works Company (MPWC) site, which is approximately 1.6-acres, is located in the southeastern corner of Rockville, Maryland in an area that is primarily residential but also includes commercial businesses. It is privately owned, employs fewer than 100 employees at the Rockville location, and has been manufacturing water (90-93%) and oil/solvent-based (7-10%) paint products since 1967. Major structures on the site include offices, four warehouses, a manufacturing plant, testing laboratories, a repair and maintenance shop, three underground storage tanks, a drum storage yard, and an open yard and parking lot, the latter two of which are fenced.

Hazardous waste consisting of a spent solvent (mineral spirits)/paint sludge mixture is generated during the cleaning of mixing tanks used to make oil/solvent-based paints. The mixture is separated by settling, and the spent solvent decanted off and used to make oil/solvent based paints and stains. This solvent recycling practice has occurred throughout the Company's operating history.

From 1983-1990, the spent sludge was solidified and shipped off-site to an approved hazardous waste disposal facility. Since 1990, the MPWC has used the spent sludge to make paint products.

Four Solid Waste Management Units (SWMUs) were identified at the MPWC site: (1) A Satellite Accumulation Area for spent solvents/sludges located in the lower level of the manufacturing plant; (2) Fenced Drum Storage Yard; (3) Warehouse 3, including a Recycled Solvent Storage Area; and (4) Fenced Open Yard and Parking Lot.

Before 1990, drums of spent solvent and sludge were stored in all of these SWMUs periodically. Currently, the only significant quantities of hazardous wastes present on-site are 3-55 gallon drums of spent solvent/sludge kept in SWMU1. These wastes are generally stored for less than three days before they are used to make a batch of paint or stain.

Another waste produced during paint manufacture is a mixture of titanium dioxide and clay dust. Although not regulated under CERCLA or the Resource Recovery Conservation Act (RCRA), titanium dioxide may be toxic to humans. The MPWC has always recycled these dusts back through its manufacturing processes.

There are three underground storage tanks located in SWMU-2 that were installed in 1967. These tanks contain ethylene glycol, mineral spirits, and ester alcohol, and have never been inspected, so that their condition is perhaps unknown. The MPWC plans to replace these tanks in 1992.

The majority of the 153,223 people (99.8%) within a four mile radius of the site, as well as the MPWC employees, receive potable water from two municipal systems, the Washington Suburban Sanitary Commission (WSSC) and the Rockville Department of Public Works (DPW). These systems draw water from intakes located on the Potomac and/or Patuxent Rivers, which are not on the surface water pathway for the site. About 335 people obtain drinking water from 129 private domestic wells located over two miles from the site.

The surface water runoff route from the site is northeast both overland and through storm drains to Rock Creek, which is about 0.85 mile away. The entire 15-mile surface water pathway is along Rock Creek, which flows at a rate of 10-100 cubic feet per second (cfs) and is used for recreational fishing. About 1.8 stream miles of palustrine forested wetland frontage are present along the pathway. The length of the surface water pathway that occurs in Washington, DC is a National Park.

There are six homes located within 200 feet of the eastern perimeter of SWMU-4. However, up to 1990, when this SWMU was active, most wastes were stored on its western side. The SWMU is paved with concrete, and is not suspected of being contaminated with hazardous wastes. There are no schools or day care centers within 200 feet of any SWMUs. The western and northern perimeters of the MPWC property are fenced, the site is equipped

with a 24-hour alarm system, and the buildings and entrance gate are kept locked after working hours, all of which discourage unauthorized individuals from entering the property.

No major spills of hazardous wastes are known to have occurred during the MPWC's operating history. This coupled with the Comapny's past and present waste handling, disposal, and recycling practices, have reduced the potential for releases of hazardous wastes to the environment.

2.0 SITE DESCRIPTION

The McCormick Paint Works Company (MPWC) site is located in Montgomery County at 2355 Lewis Avenue, Rockville, Maryland in a mixed residential and commercial area. It is situated at 39°3′52" north latitude by 77°7′21" west longitude on the Kensington, MD 7.5 minute U.S. Geological Survey (USGS) topographic quadrangle map. The Maryland Grid Coordinates of the site are 448,700 feet north by 765,250 feet east.

To reach the site from Baltimore, proceed south on

Interstate-95, then west on the Capitol Beltway (Interstate-495)

to the Rockville Pike exit (Route 355). Proceed north on

Rockville Pike for approximately 4.6 miles and turn right onto

Edmonston Drive. Go one block to Lewis Avenue and turn right;

the plant is located approximately 0.9 miles on the right side.

The 1.6-acre MPWC site is currently active as a paint manufactory. This acreage includes the areas of Warehouses 3 and 4, which are leased (Section 2.1).

Major structures on the site include a two-level manufacturing plant, four warehouses, a loading dock, testing laboratories, a repair and maintenance shop, offices, and a sales showroom for the Company's products (Figure 3). Also present are a drum storage yard, where three underground storage tanks and a

titanium dioxide dust collection unit are located, and a larger yard and parking area, both of which are outdoors and fenced.

The property is fenced along the western and northern perimeters, and excluding the drum storage yard, the entire site is covered with asphalt or concrete (Figure 3).

Small commercial businesses are located immediately north and south of the site. To the east, directly across Lewis Avenue, is a residential area. Twinbrook Elementary School is situated about 1500 feet northeast of the site. The Baltimore and Ohio (B&O) railroad tracks run adjacent to and less than 100 feet uphill of the western perimeter of the site. Paralleling the B&O tracks are Metroliner tracks; immediately west of these tracks are more small businesses.

The terrain under the site has a slope of 0-1% that increases to approximately 3.0% to the northeast. The surface water runoff route from the site is overland and through storm drains northeast to Rock Creek, which is about 0.85 mile (4,488 feet) away.

Hazardous wastes, primarily spent solvents and sludges, have been generated on-site since 1967 when the plant began operations. However, the MPWC ceased off-site shipment of all wastes in 1990.

Wastes produced from paint production and associated activities are currently kept on the first level of the manufacturing plant (spent solvents and sludges) and in the drum storage yard (titanium dioxide dust). These wastes are eventually reused in the manufacture of paints and stains (Sections 3.0 and 3.1).

2.1 SITE OWNERSHIP AND SITE USE

The site property is currently owned by Thomas P. McCormick, President of the MPWC, who purchased it in 1966. All of the site is owned by the MPWC, except for Warehouses 3 and 4, which are leased. A more complete site ownership history is given in Appendix A.

The MPWC has been manufacturing and distributing paint and related products since 1967. Currently, the Company manufactures an estimated 4,500 gallons of paint per day ²⁶. Of this amount, approximately 90-93% is water-based and 7-10% is oil/solvent-based paint.² The Company operates one shift and employs less than 100 people at the Rockville location.

The plant uses about 100 raw materials in its manufacturing processes, including titanium dioxide, calcium carbonate, aluminum silicate, water-based emulsions, alkyd resin, linseed oil, zinc oxide, mineral spirits, and ethylene glycol. 11,26

Certain bulk solvents, pigments, resins, and other chemicals are delivered by tanker trucks and gravity-fed to 6 above-ground storage tanks in the manufacturing plant, or to three underground storage tanks in the drum storage yard. Mineral spirits, ethylene glycol, and ester alcohol ("Texanol") (Appendix B) are stored in these tanks (Section 2.4); any excess material is usually drummed and taken to the plant to be used first. Ethylene glycol is used to make water-based paint, and ester alcohol and mineral spirits are used in oil/solvent-based paint.

Materials that are temperature resistant such as certain oils, alkyd resin, naptha, and mineral spirits may be kept in the drum storage yard along the western side of the fence. Other raw materials, including dry pigments, extenders, clays, and additives are stored in Warehouse 3.2 Warehouses 1,2, and 4 are used to store finished paint products. 17

Wastes generated at the site include spent solvent (mineral spirits) and sludge produced from cleaning certain paint mixing tanks in the plant, and a titanium dioxide dust resulting from paint manufacture. More information on the current and historical methods of handling, storing, and disposing of these wastes is contained in Sections 3.0 and 3.1.

No major spills of hazardous wastes are known to have occurred during the MPWC's operating history. 17,26 The Company

has procedures for handling any spills or releases in its Contingency Plan.

The MPWC is located in a predominantly residential area.

This area also includes some small commercial businesses adjacent to the site's northern and southern perimeters, and opposite the railroad tracks that parallel the western perimeter.

2.3 PERMIT AND REGULATORY ACTIONS

On July 29, 1980, the MPWC was issued an EPA identification number (MDD00003248275) under the federal Resource Conservation and Recovery Act (RCRA) and the Code of Maryland Regulations (COMAR) as a Controlled Hazardous Substances (CHS) generator. The Company shipped hazardous waste offsite to an approved disposal facility from 1983 to 1990. (Appendix C).

A RCRA Incident Report dated December 14, 1983 was submitted to the MPWC. Fifteen empty drums marked with the Company's hazardous waste labels were found off of Snouffer School Road near Gaithersburg. Upon investigation, it was determined that the drums had been donated to Kettler Brothers Contractors for non-hazardous uses, and that they were empty when given. Evidently the hazardous waste labels simply had not been removed before the empty drums were donated. No violations of federal or state environmental regulations were indicated (Appendix D).

A RCRA Enforcement Inspection was conducted at the MPWC by the MDE/HSWMA on December 27, 1990. The inspector determined that the MPWC (1) lacked a contingency plan and emergency procedures; (2) lacked a training program for handling hazardous wastes; (3) was storing hazardous spent solvents and sludges that were being held for recycling in the drum storage yard, which was not impervious and lacked secondary containment; (4) that the Company had not demonstrated that there was a market for the paint products manufactured from the spent solvent/sludge; and (5) that open five gallon cans containing hazardous waste solvent were present. In response to Item 3, the MPWC constructed a concrete diked area in Warehouse 3 for storage of spent solvents in January, 1991. A follow-up inspection performed on January 28, 1991 concluded that the MPWC was following all applicable COMAR/CHS regulations (Appendix D).

The MPWC was inspected by the MDE/Air Management

Administration in May and October, 1988, and February, 1989, and

found to be in compliance with all relevant regulations. 11

Currently, the Company has no federal or state environmental permits. 17

2.4 REMEDIAL ACTIONS

To date, no remedial actions under CERCLA are known to have taken place at the MPWC site. To the best of the Company's knowledge, no major spills of hazardous waste have occurred at the site during its operating history. 17,26

In the drum storage yard, there are three underground storage tanks; two have a 1,000 gallon and one a 6,000 gallon capacity. Mineral spirits are kept in the 6,000 gallon tank, and ester alcohol and ethylene glycol are stored in the other two.

These tanks were installed in 1967 and have not been inspected. 26

The MPWC plans to replace these tanks in 1992. The new tanks will be equipped with measuring probes and leak detectors, and a monitoring panel will be installed in the Environmental Safety and Health Coordinator's office. 16,17

3.0 WASTE DESCRIPTIONS

The MPWC has been a paint manufactory and generator of hazardous wastes for 25 years. Hazardous waste present at the site is a mixture of spent solvent (mineral spirits) and paint sludge produced from the cleaning of oil/solvent-based paint mixing tanks. No solvents other than mineral spirits are used. An estimated 5,000 - 6,000 gallons of spent solvent/sludge are generated annually.²

Additionally, a mixture of titanium dioxide (up to 30%) and clay dust is produced during the manufacture of paint. Although not classified as a hazardous waste under CERCLA or RCRA regulations, titanium dioxide has an Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) of 15 milligrams per cubic meter, and if inhaled may cause slight lung fibrosis. Approximately 6,000 pounds of dust are generated annually. 2

Before February, 1991, the MPWC collected and stored the spent solvents in 55-gallon drums in Warehouse 3, the drum storage yard, or the satellite accumulation area in the manufacturing plant (Section 3.1) In response to a RCRA Inspection in December, 1990, the Company constructed a concrete diked area in Warehouse 3 for the storage of spent solvents (Section 2.3).

Hazardous Waste Annual Reports are available for 1983-1990 and are included in Appendix C. No hazardous wastes were shipped off-site for disposal from August, 1990 through 1991.

From 1967-1982, the spent solvents and paint sludges were separated by natural settling. The spent sludge was solidified with clay and stored onsite; in 1983 the accumulated sludge was disposed of as a waste flammable material at an approved hazardous waste landfill. From mid-1984 to August, 1990, shipments of this kind of material were made at least every 90 days.³

From 1967-1990, most of the spent solvent was decanted off after settling and reused in the paint manufacturing process. The spent solvents were used to make exterior wood stains, and different oil/solvent-based paints, depending on the "color" of the solvent (Subsection 3.1.1). The only years that some spent solvents were shipped for offsite disposal were 1986 and 1990, presumably because there were some quantities that were not reusable.

Since August, 1990, the plant has been using the spent sludge in its manufacturing processes. After separation from the solvents, the sludges are used to produce a gray paint that is used in-plant, and a redoxide primer that is sold commercially.² (Appendix D).

In 1983 and 1984, hazardous waste solids containing mercury were shipped for offsite disposal. Up to 1984, mercury was used as a preservative in water-based paints. Wastes containing mercury were formerly stored in Warehouse 3.²

Titanium dioxide and clay dust generated from paint production on both levels of the plant is suctioned through pipes by a dust collection unit located in the drum storage yard into 3-55 gallon drums with sealed covers. The dust is kept in the drum storage yard until it is needed to make a batch of paint. The MPWC has always recycled this dust throughout its entire operating history.

Small quantities of hazardous wastes are generated in the testing laboratories and the Spray Department. These wastes are reused in a manufacturing process.

The MPWC plant contains a tank for collection of wastewater from cleaning the water-based paint mixing tanks that is located on the upper level of the plant. This wastewater is recycled back through the manufacturing processes.

Used motor oil and antifreeze from the maintenance of vehicles were generated at the plant until 1991. These wastes were typically picked up by local gas stations or shipped offsite for disposal. The last shipment of waste oil was made on

January 31, 1991, and no vehicle maintenance producing wastes has been done on-site since then.^{2,3}

3.1 SOLID WASTE MANAGEMENT UNITS (SWMUs)

Four SWMUs have been identified at the MPWC site which are shown on Figure 3 and described in the following subsections.

3.1.1 SWMU1 - Satellite Accumulation Area

This SWMU is located on the first level of the manufacturing plant, and currently includes 3-55 gallon drums for the collection of spent solvent and sludge generated during the cleaning of oil/solvent-based paint mixing tanks. The tanks on the first level are portable and can be moved directly to the SWMU to be emptied. Spent solvent/sludge from the tanks on the second level of the plant is drained through pipes in the ceiling into 5-gallon containers and then transferred to the drums.

Each of the three drums contains either "clear," "white," or "colored" spent solvent, which is separated from the sludge and used to make different kinds and colors of paint products. The MPWC has reused most of its spent solvent throughout its operating history. The spent sludge has also been used as a raw material since August, 1990 (Section 3.0).

The spent solvents are held in sealed drums in this SWMU for 1-3 days before being used to make paints and stains. The floor of the unit is concrete, and there are no records of any spills.

This SWMU has been active since manufacturing began in 1967, and there are no plans for closure. Before February 1991, more than three drums of spent solvent/sludge were kept in this unit.

3.1.2 SWMU2 - Drum Storage Yard

The drum storage yard is fenced and located outdoors behind the manufacturing plant on the western side of the property. It is approximately 143'x 29' (4147 ft.²) and is covered with a gravel-like material that is not impervious.

From 1967 to 1991, drums of spent solvent and sludge were stored on the northern side of this SWMU.²⁶ Since then, no hazardous wastes regulated under CERCLA or RCRA are known to have been stored in the unit.

Drums of raw materials, empty drums, the titanium dioxide dust collection unit and drums, and the underground storage tanks containing ethylene glycol, ester alcohol, and mineral spirits are presently located here.

This SWMU has never had any secondary containment. However, no major spills are known to have occurred here.

3.1.3 SWMU3 Warehouse 3 - Recycled Solvent Storage Area

The MPWC began leasing Warehouse 3, which is approximately 4,500 ft.² in 1978.²⁶ From 1978 to 1991, hazardous spent solvents and sludges were stored here periodically. Also stored here through 1984 were hazardous waste solids containing mercury.

A recycled solvent storage area was constructed in January, 1991 on the northern side of Warehouse 3 in response to a RCRA inspection in 1990. It is a concrete diked structure that is 14' long, 5' wide, and 16" high, and has a 36 drum storage capacity (Appendix E).3

This storage area would be used to hold any drums of spent solvent that for some reason could not be recycled into a manufacturing process. Any such drums would eventually be shipped offsite for disposal at an approved hazardous waste facility.

No hazardous wastes were kept in this storage area in 1991, and none are being stored here at present. There are no plans for closure of this SWMU. During the site visit on October 25, 1991, 9-55 gallon drums of oil/solvent-based paint were

incorrectly being stored in this unit. On a second site visit on March 23, 1992, the storage area was empty.

Currently, only raw materials are being kept in Warehouse 3.26

3.1.4 SWMU4 - Fenced Open Yard and Parking Lot

The western side of this unit (5,751 ft.²) was used from about 1983 through August, 1990 as a temporary storage area for drums of hazardous waste awaiting transport offsite for disposal. The wastes were moved here from the other SWMUs so that they could be picked up by the trucks removing them from the site.

Usually, wastes were kept here for no more than 24 hours.² 2

A few 55-gallon drums used to collect spent solvent from cleaning of manufacturing equipment being repaired in the Spray Department were also formerly kept in this SWMU (Figure 3). This practice has been discontinued.²⁶

The entire SWMU is approximately 15,176 ft.² and is paved with concrete. Only empty 55-gallon drums are being stored here at present. There was no evidence of contamination of this SWMU with hazardous waste.²⁶

4.0 SPECIAL CHARACTERISTICS

The average annual precipitation at the MPWC site area is approximately 40 inches and the mean annual lake evaporation is about 34 inches. The average annual net precipitation is therefore 6 inches. The 2-year, 24-hour rainfall is approximately 3.4 inches.

Soil in the vicinity of the site is Glenelg Series silt loam with slopes which vary from 3 to 8% (Figure 6). 12 The Glenelg Series consists of moderately well-drained soils that developed from materials weathered from mica schist or, in some places, from granitized schist or gneiss. These soils have a well-developed textural subsoil that is substantially finer in texture than the surface soil layer. A typical profile of Glenelg silt loam included 0-8 inches of dark brown, subangular blocky to coarse, friable, crumb structure surface soil (A-Horizon). Flakes of mica and fragments of channery phyllite or schist are abundant. The boundary with the underlying subsoil is abrupt and smooth. The surface soil is strongly acidic.

The upper subsoil layer consists of 8-20 inches of yellowish-red channery, silty, clay loam with fine, subangular, blocky structure; friable when moist and plastic when wet.

Rootlets are fairly common and there are continuous clay skins in the root channels. The next subsoil layer extends from 20 to 37

inches and consists of partially weathered parent rock material in a matrix of yellowish-red, micaceous, silt loam.

Approximately 50% of this layer consists of partially weathered rock fragments. From 37 to 62 inches, weathered to partially weathered parent rock fragments predominate with only minor amounts of soil. Below 62 inches the parent rock may be largely unweathered.

The entire Glenelg soil profile is acidic, with pH values ranging from 5.0 to 6.0. Acidity increases with depth in these soils. Hydraulic conductivity ranges from 10^{-3} to 10^{-4} centimeters per second (cm/sec). 12

4.1 GROUNDWATER AND GEOLOGY CONSIDERATIONS

The MPWC site is situated in the east-central portion of the Piedmont physiographic province, approximately 10 miles west of the Fall Line. The Piedmont Province is composed of igneous and metasedimentary rocks which have been tightly folded, intruded by granitic and mafic igneous rocks, and metamorphosed during the Appalachian Orogeny. These rocks have subsequently been uplifted and truncated by erosion to their present state. The regional structural lineation and fold axes trend in a north-south direction in this area of the Piedmont. The strata are steeply inclined, with dips ranging from 70° to 90°. 13

Crystalline rocks which comprise the Piedmont Province have been exposed at the surface for many millions of years. upper portion of these exposed rocks has been subjected to physical and chemical weathering processes which have produced a soil-like alteration product called saprolite. Essentially all exposed crystalline rocks in the Piedmont are covered by a mantle of saprolite which varies from 5 to 100 feet in thickness. saprolite retains some properties of the original parent rock (i.e. bedding, fractures, schistocity, foliation, etc.). Many of the more soluble chemical constituents in the original parent rock have been leached out or altered by groundwater. intensity of this weathering process generally decreases with depth and the saprolite grades into unaltered bedrock. weathering process is accelerated in fractures, bedding planes, joints, etc. where the groundwater moves freely through the rock. Saprolite zones are thickest in topographically high areas, and in rocks which are intensely fractured. Saprolite zones will thicken and thin locally in direct response to the presence of fractures.

Saprolites are excellent aquifers. The primary factors which determine the efficiency of a saprolite aquifer are: original parent rock type, degree of fracturing of parent rock, thickness, and topographic position. Saprolites also function as storage reservoirs for groundwater which may be transmitted to the deeper unaltered crystalline bedrock aquifers through

fractures. The permeability within these bedrock aquifers occurs almost exclusively along fractures, bedding planes, and regional joint systems. These features are the conduits for groundwater infiltration from the saprolite to the unaltered crystalline bedrock aquifers below.

In the vicinity of the site, the Wissahickon Formation is the crystalline bedrock aquifer beneath the soil profile and saprolite zone. The Wissahickon Formation is composed of banded to laminated, quartz-rich phyllites and schists with accessory magnetite and garnets. Metamorphosed sandstone and conglomerate beds containing muscovite, chlorite, albite, and quartz are interbedded throughout, but are more common in the upper half of the stratigraphic section. Amphibole, commonly with accessory epidote, occurs as concordant layers ranging in thickness from 4 inches to over 75 feet. The amphibole comprises less than 1% of the total stratigraphic section in the Wissahickon, which is estimated to be 14,000 feet or more in thickness. stratigraphic section has also been referred to as the "Upper Pelitic Schist" and the "Albite Facies" of the Wissahickon Formation.

The contact between the Wissahickon and the Sykesville Formation occurs approximately 0.3 mile east of the site (Figure 5). The Sykesville consists of poorly-foliated to massive, medium grained, biotite-plagioclase-quartz gneiss, which looks

deceptively like granite in appearance. The gneiss contains numerous clasts ranging in size from granules to cobbles and some larger slabs. The clasts are composed of chloritized biotite schist, quartz pebbles and granules, and quartzo-feldspathic rock fragments. This formation has been referred to as the Boulder Gneiss. The Sykesville Formation also contains an intensely foliated schist member which is finer-grained than the boulder gneiss. The schist member is locally devoid of clasts, commonly garnetiferous, and contains abundant muscovite.

Within the Sykesville Formation, linear exposures of basic intrusive igneous rocks occur in a north-south alignment, which may represent the trace of a fault, or major fracture zone, or zone of tensional stress (Figure 5). There are no Karst aquifers within a four-mile radius of the site.

Domestic wells in the vicinity of the site range from 70 to 340 feet in depth. These wells tap bedrock aquifers which produce from fractures in the Wissahickon and Sykesville Formations. The nearest well is approximately 2.18 miles southwest of the site near Gainsborough Road in Willerburn Acres. 4,8 The static water level in this well was originally 37 feet and the pumping rate during the test was 4 gallons per minute (gpm). This well draws from the Wissahickon Formation and was completed open hole from 42 to 125 feet. No domestic wells could be located within a two mile radius of the site.

Approximately 129 domestic wells have been drilled since 1969 within a 4-mile radius of the site. It is not known how many of these wells are still in use today.

The depth to the aquifer is estimated to be less than 50 feet, although there are no wells known to be present within two miles of the site to confirm this.

There are no municipal wells within a four-mile radius of the site.⁵

4.2 SURFACE WATER CONSIDERATIONS

The probable point of entry (ppe) to surface water is on Rock Creek, which is about 0.85 mile (4,488 feet) from the manufacturing plant. The surface water runoff route is northeast through a private residential area toward the Creek and is as follows: 1,000 feet overland; 1,400 feet through storm drains; and 2,088 feet overland to the ppe. There are no runon or runoff controls, and there is no vegetation on the MPWC site. Although it is unknown if there is any stressed vegetation along the remainder of the runoff route, it is unlikely, based on the Company's waste handling practices and the fact that no major spills are known to have occurred.

The drainage area for the MPWC site is small. The area upgradient of the site is adjacent to the western perimeter of the property. Water would flow downhill to the site, and then follow the runoff route described above.

The entire 15-mile surface water pathway is along Rock Creek (Figure 7); 10.6 stream miles are in Montgomery County, and 4.4 stream miles are in Washington, D.C. 7 From the ppe, the Creek flows southeasterly to the Maryland-District of Columbia (D.C.) line. It then flows in a southerly direction through D.C. beyond the 15-mile terminus where it empties into the Georgetown Channel of the Potomac River.

Rock Creek Regional Park is also located along the entire pathway. The area of the Park in Maryland is owned by Montgomery County and operated by the Maryland National Capitol Park and Planning Commission. ¹⁹ In Washington, D.C., Rock Creek Park is owned by the National Park Service and is considered to be a National Park. ²⁰

The flow rate of Rock Creek along the surface water pathway is estimated to be between 10-100 cubic feet per second (cfs). There is a USGS gauging station located 12.6 miles downstream of the ppe that has been operating since 1929. The average flow rate of the Creek at this station is 62.4 cfs. 21

Riverine, open water wetlands are present along the entire surface water pathway. Smaller segments of palustrine forested wetlands also border the Creek. 10 (Section 5.2)

No surface water intakes are known to exist on the pathway.

The MPWC site is located in the greater than 500 year 15

4.3 SOIL ACCESSIBILITY CONSIDERATIONS

The 1.6-acre MPWC site is currently active, manufacturing and distributing water and oil/solvent-based paints and wood stains. The Company employs less than 100 workers at the Rockville location, and operates one shift. The entire site, except for the drum storage yard located on the western side, is covered with asphalt or concrete.

Based on past waste storage practices, the drum storage yard (SWMU2) could be an area where the soil is potentially contaminated with hazardous substances, since it is not on impervious ground. However, no major spills of hazardous wastes are known to have occurred during the Company's operating history. 17,26

Additionally, the site is fenced along both the western and northern perimeters of the property (Figure 3). Less than 100 feet adjacent to the western perimeter are the B&O railroad tracks and the Metroliner tracks, which are fenced on both sides. Directly west of the railroad tracks are a number of small commercial buildings. It is unlikely that anyone from these buildings would enter the site, since both the railroad tracks and the western perimeter of the property are fenced.

Commercial businesses are also located next to the northern and southern sides of the site.

Across Lewis Avenue, which is adjacent to the eastern perimeter of the property, is a residential area. There are six homes within 200 feet of the fenced open yard and parking lot (SWMU4). However, it is believed that when SWMU 4 was active, that most hazardous wastes were temporarily stored on the western side.

The gate to the fenced open yard and parking lot, and all buildings on the MPWC site, are kept locked after working hours. Additionally, the site is equipped with a 24-hour alarm system to help prevent the entry of unauthorized individuals. Therefore, under normal circumstances, it is unlikely that any residents, or customers or employees of nearby businesses would come into contact with any SWMUs.

No schools or day care centers are known to be present within 200 feet of any SWMU, and there are no terrestrial sensitive environments on-site.

During the site visit on October 25, 1991, no areas of stained soil or spills were observed.

4.4 NEARBY LAND USE CONSIDERATIONS

The nearest occupied building to any SWMU at the MPWC site is the manufacturing plant. The plant has no emissions stacks. Any odors associated with the manufacturing process are confined to the site property. 11

The land in the vicinity of the site has been developed for commercial, industrial, and residential uses (Figure 4). There are no known complaints by nearby residents about operations at the plant that are relevant to this EPI-PA. 17

Rock Creek Regional Park, a public recreational area, is located about 0.85 miles east of the site. The nearest school to the site is Twinbrook Elementary, which is about 1,500 feet to the northeast.

There are no wetlands greater than one acre within one-half mile of the MPWC site.

5.0 POPULATION DESCRIPTIONS

5.1 DRINKING WATER POPULATION

Potable water for the 153,223 people present within a four mile radius of the site is provided by two municipal systems and private domestic wells. The majority of people (about 152,888 or 99.8%) are served by the municipal systems, which are operated by the Washington Suburban Sanitary Commission (WSSC) and the City of Rockville Department of Public Works (DPW).

The WSSC system draws water from two surface water intakes, one on the Patuxent River, and one on the Potomac River. The intake and filtration plant on the Patuxent River are located near the T. Howard Duckett Dam at Rocky Gorge Reservoir.

This Reservoir is supplied by water from the Brighton Dam and Triadelphia Reservoir, which are 13 miles upstream. The Potomac River intake and plant run by the WSSC are located about 3.5 miles upstream of the intersection of Routes 189 and 190 in Potomac, Maryland. And 23

The Rockville intake, which is also on the Potomac River, supplies water for the City of Rockville, including the MPWC site. This intake is operated by the Rockville DPW, Water and Sewer Division. It is located about midway between the WSSC's Potomac River intake and the Route 189-190 intersection. 23

The remaining 335 people are served by 129 private domestic wells. The distribution of these people, assuming an average of 2.6 persons per well for Montgomery County, is as follows:

Distance from	People Served by
<u>Site (miles)</u>	<u> Private Wells</u>
0 - 2	0
2 - 3	65
3 - 4	270
Total:	335

The nearest private domestic well is located about 2.18 miles southwest of the site about 80 feet from Gainsborough Road in Willerburn Acres. 4,8

There are no municipal wells or well systems within a four mile radius of the site. The Wellhead Protection Area (WHPA) for a municipal well located in non-karst terrain is currently defined as a two mile distance from the well. If any of this distance overlaps the four mile radius for the site, the well is considered to be in a WHPA. Based on this definition, there are no WHPAs near the MPWC site.⁵

5.2 SURFACE WATER USES

The surface water pathway for the MPWC site, from the probable point of entry (ppe) to the 15-mile terminus, is along Rock Creek in Montgomery County, Maryland and Washington, D.C. The Creek is estimated to flow at a rate of 10-100 cfs.²¹

Rock Creek is considered to be a fishery. Although it is not stocked for recreational fishing, some fishing is known to occur. 19,20

Wetlands are located along the entire surface water pathway. The total wetlands frontage is estimated to be 16.8 stream miles. Of this total, 15 stream miles are riverine, open water wetlands. The remaining 1.8 stream miles of frontage are palustrine forested wetlands that occur in small segments at various locations. The area of Rock Creek in Washington, D.C. is a National Park. No other sensitive environments are known to be present on the pathway. However, there is a study being done to determine the presence of threatened macroinvertebrates in the Creek in Washington, D.C.²⁰

There are no surface water intakes located between the ppe and the 15-mile terminus of the pathway.

5.3 NEARBY POPULATIONS

The MPWC site property is situated in the southeastern corner of Rockville, Maryland at 2355 Lewis Avenue, which is a predominantly residential avenue. The area in the vicinity of the site is residential, commercial, and industrial.

The Company employs less than 100 workers at the Rockville location, all of whom work on one shift. The nearest occupied building to any SWMU at the site is the manufacturing plant.

There are six homes within 200 feet of the eastern perimeter of SWMU4 (Figure 3). No schools or daycare centers are known to be present within 200 feet of any SWMU.

There are approximately 153,223 persons within a four mile radius of the site, excluding the MPWC employees.^{6,7,24} This population is estimated to be distributed as follows:

Net Population Estimate

Distance of Ring	Population
<u>from Site (miles)</u>	(persons)
0 - 1/4	589
1/4 - 1/2	1,874
1/2 - 1	4,105
1 - 2	21,480
2 - 3	51,220
3 - 4	73,955
Total:	153,223

This population estimate was derived by house counts and urban area estimates from USGS Topographic Maps. The house count contribution for the estimate was obtained by multiplying the number of houses by a county average of 2.6 persons per household and a 30.74% increase in the population of Montgomery County from 1980 to 1990. The urban area contribution was obtained by multiplying the area of each distance ring in square miles by the percent of the ring covered by urban shading and an average of 5,000 persons per square mile. The number of students attending Twinbrook Elementary School (650) was supplied by the school. This is the only school located within one-half mile of the MPWC site.

There are no terrestrial sensitive environments onsite, and no wetlands within one-half mile of the site.

There are no known records of significant releases of hazardous wastes to the air.

6.0 SITE VISITS

6.1 PERSONS CONTACTED

Mr. Shri Kansal, Chief Chemist

Ms. Karen Glantschnig, Environmental Safety & Health Coordinator

Mr. Malcolm Allison, Product Executive

Mr. Gordon Allison, Vice President

McCormick Paint Works Company, Inc. 2355 Lewis Avenue Rockville, Maryland 20851 (301)770-3235

6.2 SITE OBSERVATIONS

On October 25, 1991, Ms. Shichin Tzeng and Mr. Richard Grills of the CERCLA Site Assessment/Pre-Remedial Division of MDE-HSWMA visited the MPWC site to gather information for this EPI-PA. Ms. Tzeng and Mr. Grills met with Mr. Shri Kansal, Ms. Karen Glantschnig, and Mr. Malcolm Allison who represented the MPWC (Section 6.1). The MPWC representatives explained their manufacturing processes, waste storage and handling procedures, and recycling practices.

Hazardous wastes consisting of spent solvents (mineral spirits) and paint sludges are produced during the cleaning of the paint mixing tanks. The spent solvent and sludge are separated and recycled through different manufacturing processes to produce a variety of paints and stains.

The plant also recycles the dust of titanium dioxide and clay, which is generated during the manufacture of paint.

Three Solid Waste Management Units (SWMUs) were identified. These are the drum storage yard, the satellite accumulation area for spent solvents in the manufacturing plant, and Warehouse 3, which includes the recycled solvent storage area. During the site visit, nine drums of oil-based paint were incorrectly stored in the recycled solvent storage area.

The surface water runoff route from the site is northeast toward Rock Creek. The entire site, except for the drum storage yard, is paved with concrete or asphalt, and is partially fenced. No stained soil was observed.

A second site visit was conducted on March 23, 1992, by Ms. Ginny Sells, MDE/HSWMA, CERCLA Pre-Remedial Division. A meeting was held with Mr. Shri Kansal, Mr. Malcolm Allison, Ms. Karen Glantschnig, and Mr. Gordon Allison of the MPWC. The purpose of the EPI-PA was explained to the representatives of the MPWC. Additional information needed for the report was gathered, including the size of the site, whether the underground tanks had ever been inspected, if any major spills had ever occurred at the site, the locations of the former spent solvent storage areas in the drum storage yard (SWMU2) and the fenced open yard and parking lot (SWMU4), and the date the MPWC began leasing Warehouse 3. Mr. Shri Kansal and Mr. Malcolm Allison accompanied Ms. Sells on a tour of the entire site. All SWMUs were observed, and photographs of the SWMUs, the major structures of the site, and the surrounding area were taken.

7.0 CONCLUSIONS

The MPWC site includes a paint manufacturing plant that has been operating from 1967 to the present. The Company makes 90-93% water-based paint and 7-10% oil/solvent-based paint.

Hazardous wastes generated consist of spent solvents and paint sludges which are produced during cleaning of the oil/solvent-based paint mixing tanks with mineral spirits.

Throughout most of the Company's operating history, the spent solvent was separated from the sludge and reused in paint manufacturing processes. From 1983-1990, all of the spent sludges were solidified and transported as hazardous waste flammable material to an approved disposal facility; some spent solvent that was not reusable was also shipped off-site as well. Currently, the main hazardous wastes kept on-site are 3-55 gallon drums of spent solvents/sludges (see SWMU1 below) which are eventually recycled to produce paint products.

Four Solid Waste Management Units (SWMUs) were identified at the site: (1) Satellite Accumulation Area for spent solvents/sludges in the manufacturing plant; (2) Drum Storage Yard where spent solvents/sludges were stored through 1990; (3) Warehouse 3, where spent solvents/sludges were stored from 1978-1990, which also includes the recycled solvent storage area built in 1991; and (4) The Fenced Open Yard and Parking Lot, where

drums of hazardous wastes were formerly temporarily stored before off-site shipment.

Titanium dioxide and clay dust, which is not a CERCLA or RCRA-regulated waste but is potentially toxic, is produced during paint manufacture. This dust is kept in the Drum Storage Yard (SWMU2) in 3-55 gallon drums and eventually reused to make more paint.

Also located in SWMU2 are three underground storage tanks that contain mineral spirits, ester alcohol, or ethylene glycol. These tanks were installed in 1967 and have never been inspected. Therefore, their condition is perhaps unknown. The MPWC plans to excavate these tanks and replace them in 1992.

Potable water for the MPWC site, and for 152,888 of the 153,223 people within a four mile radius of the site is supplied by two municipal systems that draw water from the Potomac and Patuxent Rivers. The remaining 335 people obtain drinking water from 129 private domestic wells located over two miles from the site.

The surface water runoff route from the site is northeast to Rock Creek, located about 0.85 mile away. The entire 15-mile surface water pathway is along Rock Creek in Maryland and the

District of Columbia (DC). About 1.8 stream miles of palustrine forested wetlands frontage are scattered along the pathway, and the area of Rock Creek in D.C. is a National Park. Rock Creek flows at 10-100 cfs, and is a fishery.

There are six homes located within 200 feet of the eastern perimeter of SWMU-4 on Lewis Avenue. However, this SWMU is paved with concrete, is not suspected of being contaminated, and has not been used as a temporary storage area for hazardous waste since 1990. No schools or daycare centers are known to be present within 200 feet of any SWMU.

Access to the property is limited by fences along the western and northern perimeters, the gate to SWMU4, which, along with all buildings on-site, is locked after business hours, and a 24-hour alarm system. This, plus the fact that nearly all hazardous wastes are currently kept in the manufacturing plant, make it very unlikely that nearby residents would come into contact with any areas of potential contamination under normal circumstances. The people most likely to be exposed are the plant workers who transport spent solvents/sludges to SWMU-1. However, the MPWC has an Environmental Safety and Health Coordinator, a Contingency Plan, and training for handling hazardous wastes.

No major spills or releases of hazardous wastes are known to have occurred at the MPWC. This, coupled with the past and present waste handling, storage, and disposal practices, have reduced the potential for a significant release of hazardous waste to the environment during the Company's operating history.

8.0 REFERENCES

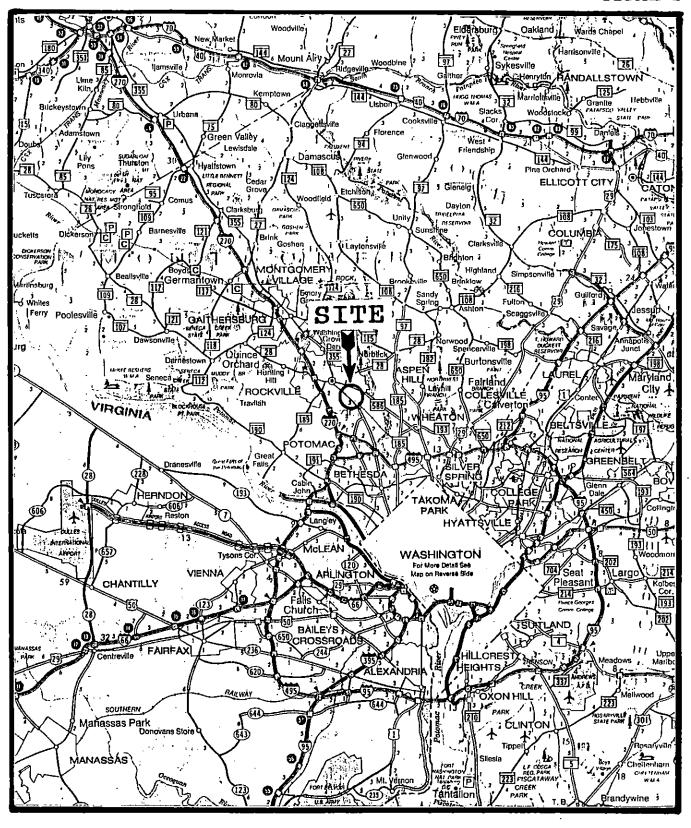
- 1. Shri Kansal, Chief Chemist, McCormick Paint Works Company (MPWC), personal communication during site visit, October 25, 1991.
- 2. Shri Kansal, telephone communications (telecons) on 1/3/92, 2/27/92, 3/2/92, 3/4/92, 3/10/92 and 3/17/92.
- 3. MDE/Hazardous and Solid Waste Management Adminnistration (HSWMA) RCRA enforcement file on the MPWC, 1991.
- 4. MDE/Water Management Administration (WMA), Residential Sanitation Program files, 1992.
- 5. MDE/WMA, Water Supply Program, 1992.
- 6. U.S. Census Bureau, 1980 Census Tract Map, Montgomery County.
- 7. U.S. Geological Survey (USGS), 7.5 Minute Topographic Maps: Kensington, MD Quadrangle, 1965, photorevised 1979. Rockville, MD-VA Quadrangle, 1965, photorevised 1979. Washington, D.C. West Quadrangle, 1965, photorevised 1983.
- 8. Miller, Ken, Maryland Department of Natural Resources (MDNR), Water Resources Administration, Telecon 3/10/92.
- 9. U.S. Weather Bureau Technical Paper 29, 1958.
- 10. U.S. Department of Interior (USDI), Fish and Wildlife Service, National Wetlands Inventory Maps, Kensington and Washington West Quadrangles, 1981.
- 11. MDE/Air Management Administration (AMA) file on the MPWC, 1991.
- 12. U.S. Department of Agriculture, Soil Conservation Service, In cooperation with Maryland Agricultural Experiment Station, 1961, Soil Survey of Montgomery County, Maryland.
- 13. Maryland Department of Geology, Mines, and Water Resources, 1953, Geologic Map of Montgomery County and the District of Columbia.
- 14. Nutter, L. J., and Otton, E.G., 1969, Groundwater Occurrence in the Maryland Piedmont. Maryland Geological Survey, Report of Investigations No. 10.
- 15. National Flood Insurance Program, Flood Insurance Rate Map, City of Rockville, MD, Montgomery County, Panel 240051 -0004B, page 4 of 4, January 5, 1978.

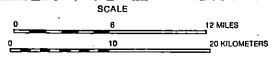
- 16. Allison, Malcolm, Product Executive, MPWC, Telecon 2/27/92.
- 17. Glantschnig, Karen, Environmental Safety and Health Coordinator, MPWC, Telecons 2/27/92 and 2/28/92.
- 18. Sittig, Marshall, <u>Handbook of Toxic and Hazardous Chemicals</u> and <u>Carcinogens</u> (Second Edition), Noyes Publications, Park Ridge, NJ, 1985.
- 19. Gougeon, Charles, Area Fisheries Manager, MDNR, Freshwater Fisheries Division, Telecon 3/2/92.
- 20. Ferebee, Ken, Resource Management Ranger, National Park Service, Rock Creek Park Headquarters, Telecon 3/3/92.
- 21. Yeaman, Bill, Park Ranger, National Park Service, Rock Creek Park Headquarters, Telecon 3/3/92.
- 22. Marks, Tom, Superintendent, Washington Suburban Sanitary Commission (WSSC), Patuxent River Plant, Telecon 3/3/92.
- 23. Beacham, Tim, Superintendent, WSSC, Potomac River Plant, Telecon 3/3/92.
- 24. Census data for Montgomery County, Maryland Office of Planning, 1980 and 1990.
- 25. McKay, Jeanne, Twinbrook Elementary School, Montgomery County, MD. Telecon 3/6/92.
- 26. MPWC site visit 3/23/92, information from Shri Kansal, Karen Glantschnig, Malcolm Allison, and Gordon Allison.

9.0 FIGURES

REGIONAL MAP

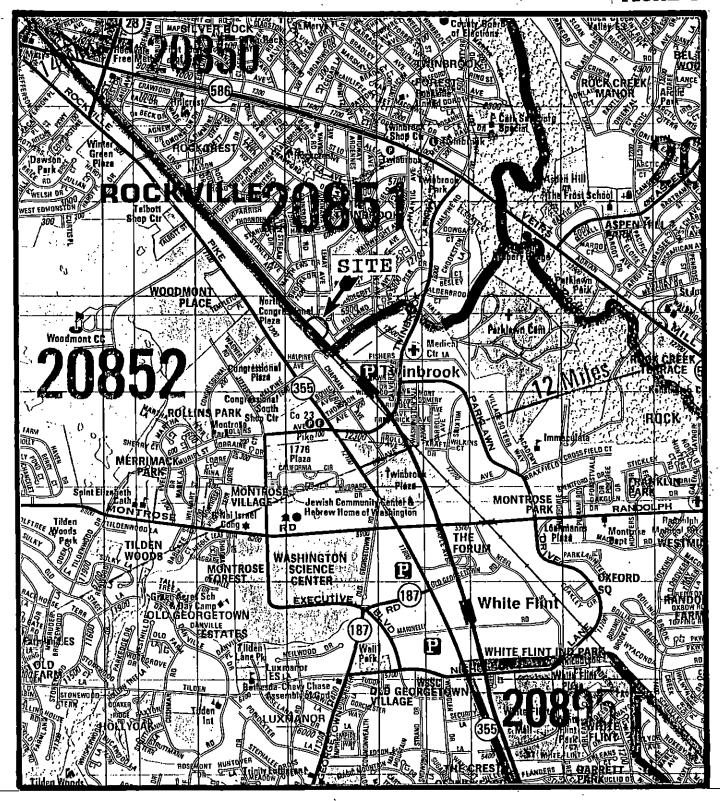
FIGURE 1

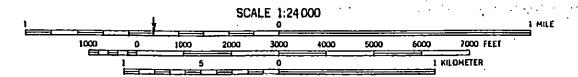


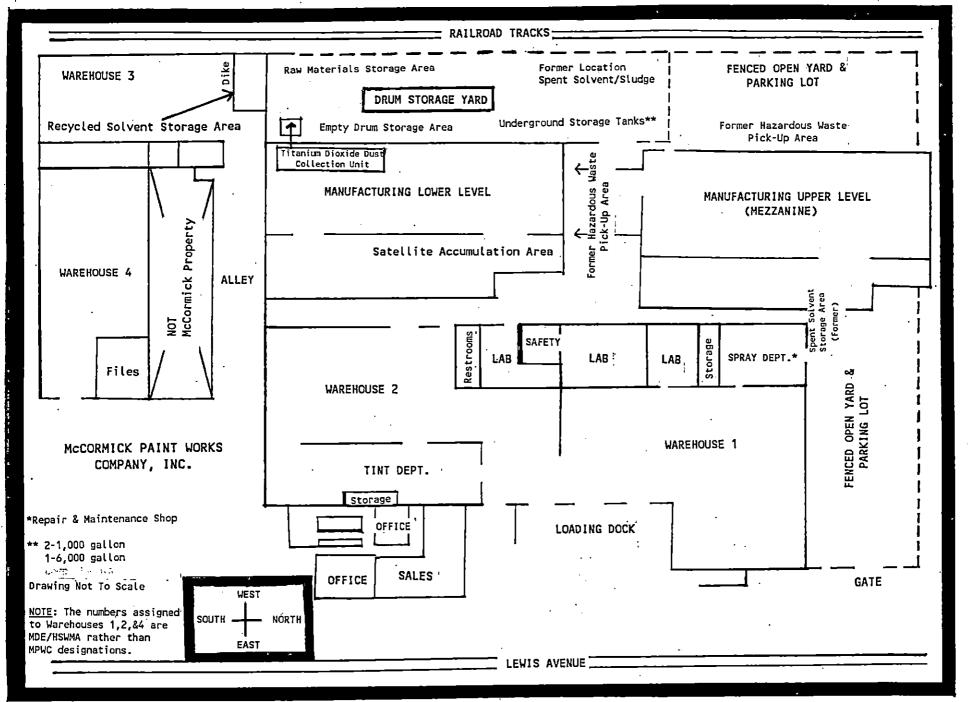


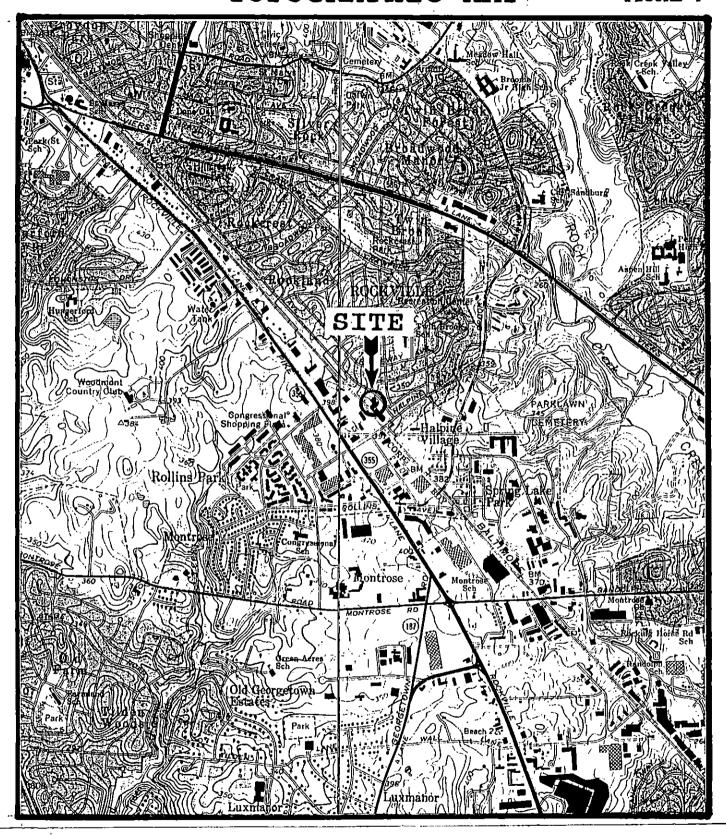
STREET MAP

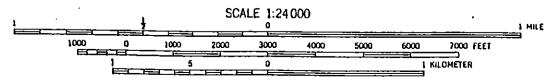
FIGURE 2



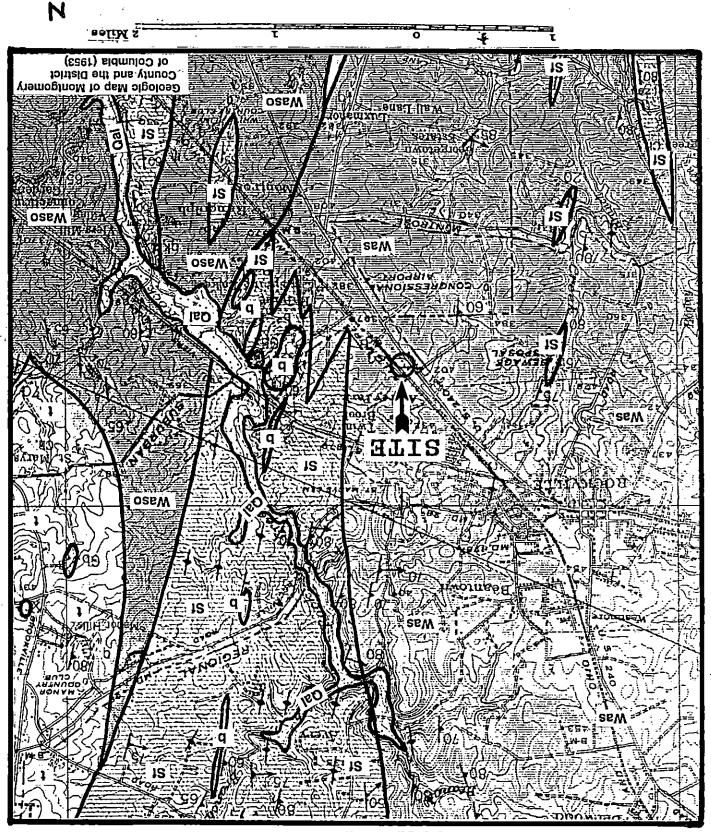








CONTOUR INTERVAL 20 FEET NATIONAL GEODETIC VERTICAL DATUM OF 1929



LEGEND:

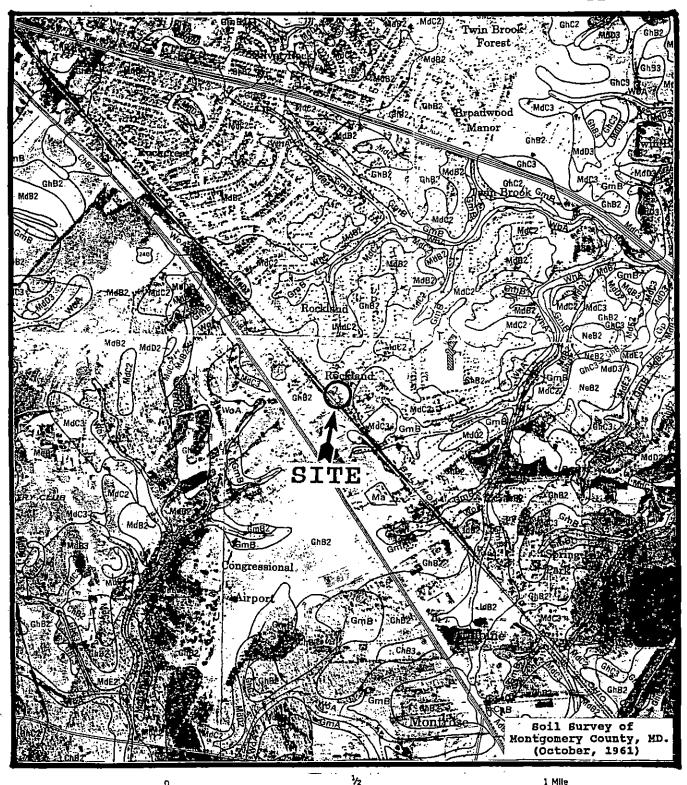
Oal - Alluvium

Was - Wissahickon Fm. (Oligaclase - Mica Facles)

St - Sykesville Fm.

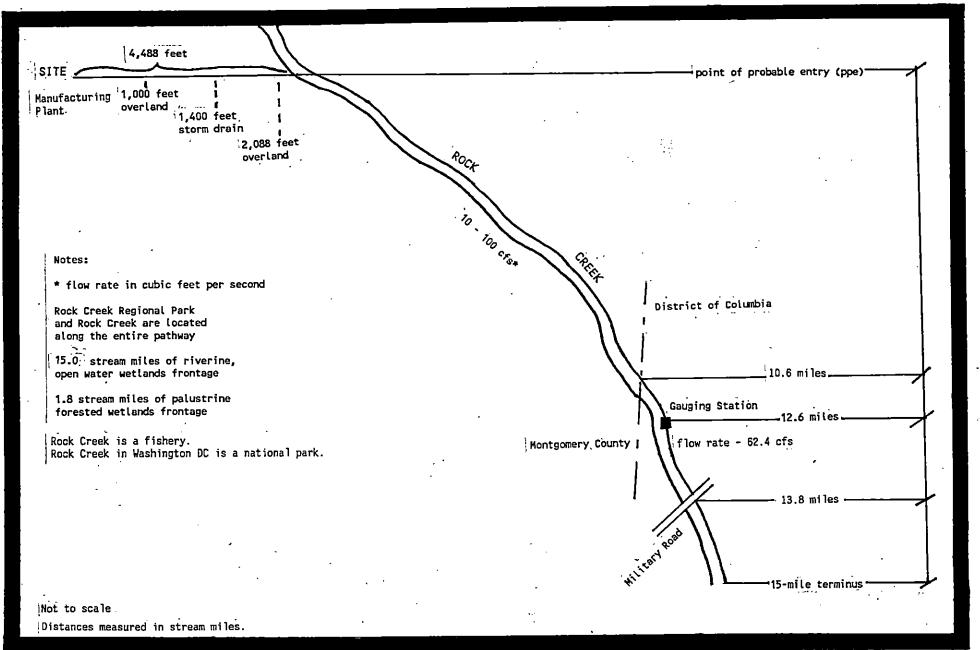
t - Tonalite with Inclusions

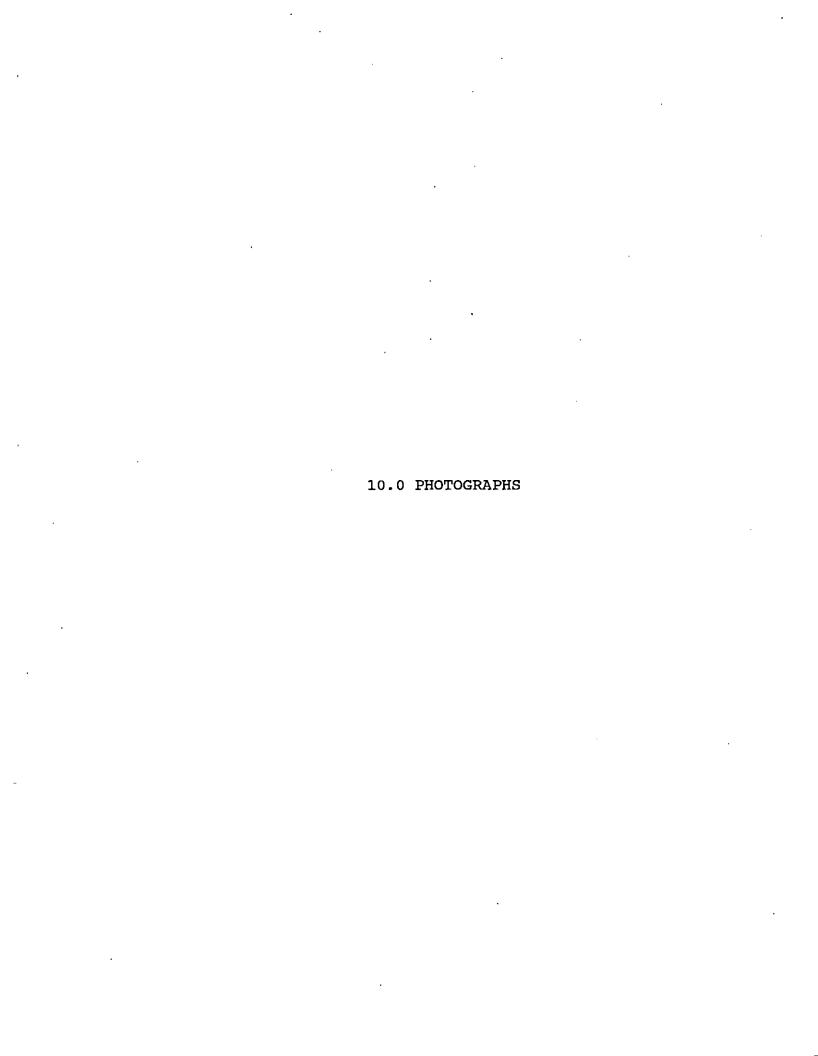
b - Undifferentiated Basic Igneous Rocks

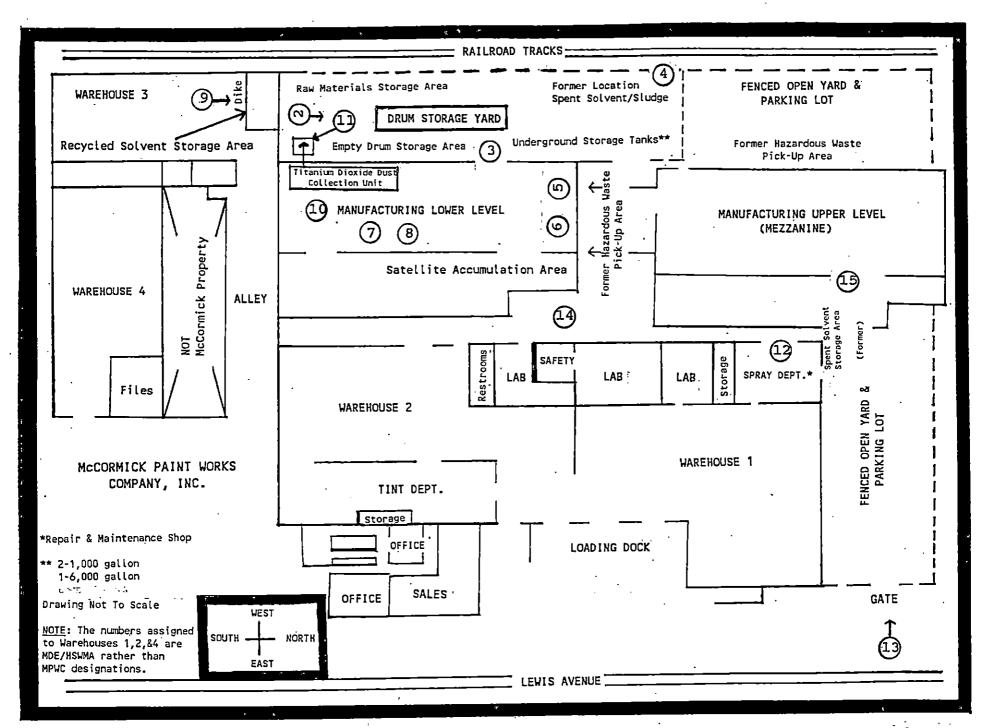


LEGEND:

GhB2-Glenelg Silt Loam , 3-8% Slope , Moderately Eroded GmB - Glenville Silt Loam , 3-8% Slope MdB2-Manor Silt Loam , 3-8% Slope , Moderately Eroded MdC2-Manor Silt Loam , 8-15% Slope , Moderately Eroded MdC3-Manor Silt Loam , 8-15% Slope , Severely Eroded









 Front view of the Mc Cormick Paint Works Company, taken across Lewis Avenue, facing west.



2. Panoramic view of the Drum Storage Yard (SWMU2)



3. Three underground storage tanks in SWMU2.
The one in the background (north) is the 6,000 gallon tank containing mineral spirits. The other two are 1,000 gallon tanks containing ester alcohol and ethylene glycol.



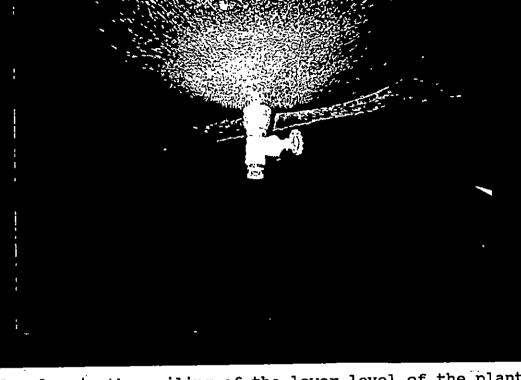
4. The northern corner of SWMU2, where spent solvents and paint sludges were stored before 1991.



5. The Satellite Accumulation Area for spent solvents /sludges located on the lower level of the manufacturing plant (SWMU1). This unit includes 3-55 gallon drums.



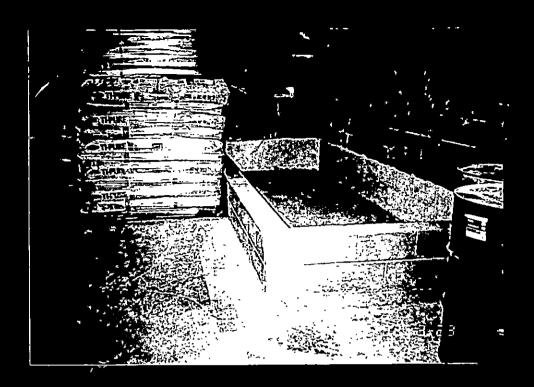
6. Another view of SWMU1, showing Haz-Mat Spill Response Kit.



7. A valve in the ceiling of the lower level of the plant through which spent solvent/sludge from cleaning an oil/solvent-based paint mixing tank located on the upper level of the plant is drained into the unit shown in Photo 8.



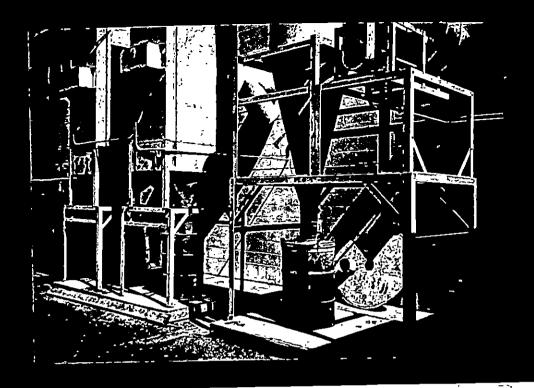
8. The spent solvent/sludge is drained through a pipe into a portable tank which in turn is drained into a 5-gallon bucket. The bucket is transported to one of the 3-55 gallon drums in the Satellite Accumulation Area and emptied.



9. Warehouse 3, showing the recycled solvent storage area (SWMU3).



10. Pipeline inside the plant for the collection of titanium dioxide/clay dust, which exits through the wall on the upper level (center photo) into the collection and storage unit located in the Drum Storage Yard (SWMU2).



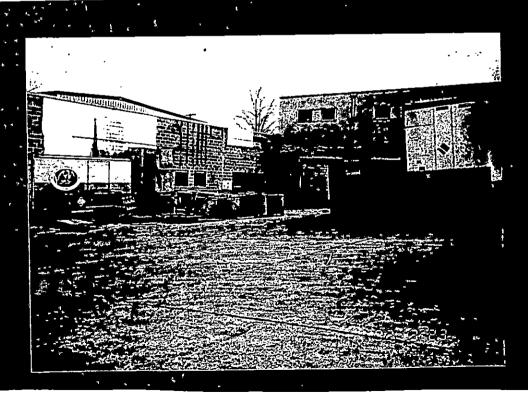
11. The titanium dioxide/clay dust collection unit located in SWMU2.



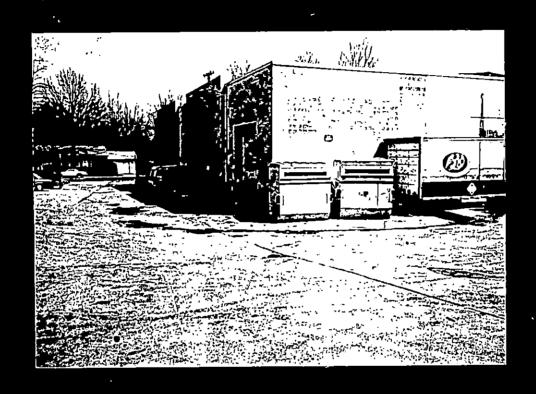
12. MPWC employee working on manufacturing equipment in the Spray Department, which is a repair/maintenance shop.



13. A view through the gate to the Fenced Open Yard and Parking Lot (SWMU4). The trucks are parked on the western side near an area where hazardous wastes were formerly temporarily stored (24 hrs.) before off-site shipment to an approved disposal facility.



14. A view facing southeast, showing the rear of the testing laboratories of the left, and the northern side of the manufacturing plant adjacent to the western side of SWMU4, where hazardous wastes were also temporarily stored before off-site shipment.



15. The corner of the Spray Department, where a few drums of spent solvent from cleaning manufacturing equipment were formerly stored. This practice has been discontinued. Also shown is the nearest residence (across Lewis Avenue) to the gate to SWMU4 on the eastern perimeter of the site.

APPENDIX A

SITE OWNERSHIP HISTORY MD-398

On March 1, 1966, T.P. McCormick and Thomas P. McCormick purchased the property from the Halpine Development Corporation (Liber 3476 Folio 88 Book 88 Platt 9440).

On February 20, 1961, the Halpine Development Corporation purchased the property from Robert A. Pugh and his wife Janice (Liber 2823 Folio 125 Book 50 Platt 3870).

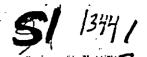
On April 21, 1959, Robert A. Pugh and his wife Janice purchased the property from Lawrence L. Levin and his wife Regina Levin (Liber 2614 Folio 131).

Prior to T.P. McCormick buying the property in 1966 the said property was woodland.

Prepared by Mr. James Freeman MDE/HSWMA CERCLA Pre-Remedial Division

APPENDIX B

ſ



EXON COMPANY, U.S.A. A DIVISION OF EXXCH CORPORATION

DATE ISSUED: SUPERSEDES DATE

MATERIAL SAFETY DATA SHEET

EXXON COMPANY, U.S.A.

P.O. BOX 2180

HOUSTON, TX 77252-2180

IDENTIFICATION AND EMERGENCY INFORMATION

PRODUCT NAME 627 SOLVENT

PRODUCT CODE

CHEMICAL NAME Petroleum Solvent

CAS NUMBER 8052-41-3

PRODUCT APPEARANCE AND ODOR Clear water-white liquid Mineral spirits odor

EMERGENCY TELEPHONE NUMBER (713) 656-3424

Kigular 7

COMPONENTS AND HAZARD INFORMATION

COMPONENTS

CAS NG. OF COMPONENTS

APPROXIMATE CONCENTRATION

This product can be defined as:

Stoddard Solvent

·BO52-41-3

100%

It consists predominantly of CT-C10 hydrocarpons. .

This product contains:

C7-C10 saturated hydrocarbons

Toluece

Mixture 108-88-3 1330-22-7 Approximately 83% Approximately 0.4%

Xylene

100-4--4

Approximately 0.8%

Ethylbenzene

C8+ Aromatics

Mixture

Approximately 0.2% Approximately 14%

See Section $\bar{\epsilon}$ for Health and Hazard Information.

See Section H for additional Environmental Information.

HAZARDOUS MATERIALS IDENTIFICATION SYSTEM (HMIS;

Health Flammability React: vity BASIS

Recommended by Exxon

EXPOSURE LIMIT FOR TOTAL PRODUCT

BASIS

100 ppm (525 mg/m3) for an 8-hour workday

Recommended by the American Conference of Governmental Industrial Hygienists (ACGIH) for Stoodard Solvent

AWT ruph-8 mgg CO2

OSHA Regulation 29 CFR 1910.1000

C. PRIMARY ROUTES OF ENTRY AND EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT

If splashed into the eyes, flush with clear water for 15 minutes or until irritation subsides. If irritation persists, call a physician.

In case of skin contact, remove any contaminated clothing and wash skin thoroughly with soac and water.

945-0277MWH001)

72-62-7820-01

MATERIAL SAFETY DATA SHEET

AESIBIL. Allenda

F.O. BOX 2215 COLUMBUS, OHIO 43216 (6:41988-3358

24-nour Emergency Telephone 1 (800) 274-5250 es 1-807-ASHLAN

203075

ETHYLENE GLYCOL

Page:

THIS MSDS COMPLIES MITH 29 CFR 1910-1200 (THE HAZARD COMMUNICATION STANDARD)

Product Name: ETHYLENE GLYCOL
CAS NUMBER: 107 63

MCCORMICK PAINT WORKS CO. 2355 LEWIS AVENUE MD 2 MD 20851 05 50 071 5761280-

Data Sheet No: 0000003-00%

PROCUCT: 3370000 INVOICE: 850207 INVOICE DATE: 01/26/90

TO: SAME

ATTN: PLANT MGR./SAFETY DIR-

AND THE PROPERTY OF THE PROPER

General or Generic ID: GLYCOL

CCT Hazard Classification: NOT APPLICABLE

神でというというというという。CESECIEON EDE-DOMPONENTIS AND EXAMPLE AND EXAMPL

MTP AND OSHA CARCINOGENS AND CHEMICALS SUBJECT TO THE REPORT-OF SARA TITLE III SECTION 313 ARE IDENTIFIED IN THIS SECTION. SEE DEFINITION PASE FOR CLARIFICATION

INGREDIENT

% (by MT)

PEL

TLV

ETHYLENE GLYCOL CAS #: 107-21-1

100

50 PPM - CEILING

50 PPM - CEILING

<u>Notes</u>:

1 1) THIS CHEMICAL IS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF SARA TITLE III.

CARLO SERVICE SERVICE SECURION SEGRETARIA SEGULDADA SE SE SE 401.00 Deg F 205.00 Deg C) 760.00 mg sg for PRODUCT **Bailing Point** ล 0.10 mm tg 68.00 Deg r 20.00 Deg C1 Yapor Pressure for PRODUCT AIR = 1 2.2

Specific Vapor Density Specific Gravity

1.115 68.00 Pag F 20.00 Pag C) 1.115

Percent Volatiles

NOT APPLICABLE

Evaporation Rate

IN-BUTYL #CETATE = 1)

< 10.00

FLASH POINTLICC

232.0 Deg F

Habitial Endigening Hills.

111.1 Deg CJ

EXPLOSIVE LIMIT

(PRODUCT)

LOHER -3.2% UPPER - 15.3%

EXTINGUISHING MEDIA: MATER FOG OR CARBON DIOXIDE OR DRY CHEMICAL

HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS:, CARBON DIOXIDE AND CARBON MCNOXIDE, ETC.

FIREFIGHTING PROCEDURES: HEAR SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN THE POSITIVE PRESSURE DEMAND MODE WHEN FIGHTING FIRES.

WATER OR FOAM MAY CAUSE FROTHING WHICH CAN BE VICLENT AND POSSIBLY ENDANGER THE LIFE OF THE FIREFIGHTEX. ESPECIALLY IF SPRAYED INTO CONTAINERS OF HOT, BURNING LIQUID.

SPECIAL FIRE & EXPLOSION HAZARDS: NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY.

NFPA CODES:

HEALTH- 1

FLAMMABILITY- 1.

REACTIVITY- 0

并是解释的这种表现的是否的一种,并且是 SEGTION ON THE MATHER PAZZARD TO ATTAX 中华中华中华中华中华中华

PERMISSIBLE EXPOSURE LEVEL

PPM - CEILING

THRESHOLD LIMIT VALUE

50 PPH - CEILING

EFFECTS OF ACUTE OVEREXPOSURE: FOR PRODUCT

EYES - CAN CAUSE IRRITATION. SKIN - CAN CAUSE SLIGHT IRRITATION. BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE MASAL AND RESPIRATORY IRRITATION. SMALLOHING - CAN CAUSE GASTROINTESTIMAL IRRITATION, MAUSEA, VOMITING, AND DIARRHEA.

FIRST AID:

IF ON SKIN: THOROUGHLY MASH EXPOSED AREA WITH SOAP AND MATER. REMOVE CONTAMINATED CLOTHING. LAUNDER CONTAMINATED CLOTHING BEFORE RE-USE.

CONTINUED ON PAGE: 2

MATERIAL SAFETY DATA SHEET

EASTHAN CHEMICAL PRODUCTS, INC. EASTMAN KODAK COMPANY Kingsport, Tennessee 37662

For Health Hazard Information, Call: (615) 229-6094

For Other Information, Call Your Eastman Representative

Eastman Operator: (615) 229-2000

Date of Preparation 05-19-89

SECTION I. IDENTIFICATION

-- Name:

"TEXANOL" Ester-Alcohol

- -- Synchyms: PM 2404; 2,2,4-Trimethyl-1,3-pentanediol monoisobutyrate
- -- Formula: C12H24O3
- -- Molecular Weight: 216.36

SECTION II. COMPONENT AND PRECAUTIONARY DATA

A. COMPONENTS:

Approx Weight 🖫 CAS Reg No

Eastman Kodak No

2,2,4-Trimethyl-1,3-pentanediol monoisobutyrate

100 25265-77-4 000701

PRECAUTIONARY LABEL STATEMENTS:

LCW HAZARD FOR USUAL INDUSTRIAL HANDLING

FOR MANUFACTURING USE ONLY

SECTION III. PHYSICAL DATA

- -- Appearance and Odor: Clear liquid, mild characteristic odor.
- -- Boiling Point: 244°C (471°F).
- -- Melting Point: -50°C (-58°F).
- -- Specific Gravity at 20/20°C (water = 1): 0.95.
- -- Viscosity at 20°C (68°F): 13.5 cP.
- -- Vapor Pressure: 0.02 mm Hg at 38°C (100°F), estimated.
- -- Percent Volatile by Volume: 100%.
- -- Vapor Density (Air = 1): 7.45.
- -- Evaporation Rate (n-butyl acetate = 1): 0.002.
- -- Solubility in Water: 0.5-0.8 g/L (negligible).

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

- -- Flash Point: 120°C (248°F); Method Used: Cleveland Open Cup.
- -- Autoignition Temperature: 393°C (740°F); Method Used: ASTM D 2155.
- -- Flammable Limits: LEL 0.62% at 149°C

UEL 4.24% at 201°C

-- Extinguishing Agent: Water Spray, Dry Chemical, Carbon Dioxide, or Foam. MSDS-10,528A-1 (05-89)

Replaces 04-89 Edition

APPENDIX C

•		-	
BÉFORE COPYING FORM, ATTACH SITE IDENTIFIC OR ENTER:	ATION LABEL	2-4	MARYLAND DEPARTMENT
SITE NAME MCCORMICK PAIN'T WORK	S_INC		OF THE ENVIRONMENT
2355 LEWIS AVENUE ROCKVILLE, MARYLAND			1990 Hazardous Waste Report
THE COUNTY PROPERTY OF THE COUNTY OF THE COU	20051		 -
EPAID NO. MIDID 10 10 13 12 1 41 81 2	0.7.5	FORM	IDENTIFICATION AND
(<u></u>			CERTIFICATION
		_	
INSTRUCTIONS: Read the detailed instructions	hadinging on page 7.	1990	us Waste Report booklet before completing this for
· · · · · · · · · · · · · · · · · · ·	- beginning on page 7 C	une Hazardor	is Waste Report booklet before completing this for
SEC. 1 Site name and location address County in			
SEC. 1 Site name and location address. Complete item different, enter corrections. If label is absent, er	ns A through H. Check nter information. Instru	the box ⊠ in item: ection page 7.	s A, B, D, E, F, G, and H if same as label; if
A. EPA ID No. Same as label □ or — LM D D 0 0 3 2 4 1 8	B Site/	company name	
C. Has the site name associated with this EPA ID changed since 1989	1 Yes	e au tabel 🔲 or ——	MCCORMICK PAINT WORKS INC
	X 2 No .		
D. Street name and number. If not applicable, errer industrial park, building Same as label	name or other physical locali	on description. 235	55 LEWIS AVENUE
E. City, town, village, etc. Same as label ROCKVITTE F. County		G. State	H. Zip Code
Same as label ROCKVILLE MONTG	OMERY	Same as label	Same as tabel
SEC. II Mailing address of site. Instruction page 7.		1 (4) 111	[2]0]8]5]1]-[]]
A. Is the mailing address the same as the location address?	X 1 Yes (SKIP TO SEC	· · · · · · · · · · · · · · · · · · ·	
	I Yes (SKIP TO SEC. 2 No (COMPLETE S	: III) SEC. II)	
B. Number and street name of mailing address			
C. Cily, lown, village, etc		D. State	E. Zip Code
		1	
SEC. III Name, title, and telephone number of the		1	
to the person	who should be contact	ted if questions aris	e regarding this report. Instruction page 7.
Please print: Last name ALLISON GORDON	M.I. B. Tith EX	EC. V.P.	C. Telephone
KANSAL SHRI		IEF CHEMIST	(3,0,1) $(7,7,0)$ $(3,2,3,5)$
			Extension N/Ai
SEC. IV Enter the Standard Industrial Classification (SIC) the services rendered at the site's physical location	Code that describes th	e principal products	Group of products produced or distributed
the services rendered at the site's physical location activities of the site. Instruction page 8.	on. Enter more than on	e SIC Code only if n	to one industry description includes the combined
8.			
2,8,5,1, N/A,	<u></u>	N/A	D. 1N/A 1 1
I certify under penalty of law that I have personally SEC. V documents, and that based on my inquiry of those	examined and am fam	iliar with the inform	ation submitted in this and all attached
SEC. V documents, and that based on my inquiry of those submitted information is true, accurate, and complete the possibility of fine and imprisonment.	ete. I am aware that th	ity responsible for objecte are significant p	Diaining the information, I believe that the lenalties for submitting false information, including
Number of form pages submitted			
No.	Form WR	<u> </u>	Form PS (0:0:11) Form OI,0 0
GLANTSCHNIG KAREN		. A	C. TRIG SAFETY & HEALTH COORDINATOR
The Comments of the state of th		````	E. Dale of signature 03, 25, 9,1.
Jan Jan Ja			MO, DAY YA .
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	. 0	•	Page 1 of 7

Sec. VI	Generator Status	
A1990 general Instruction	ration (CHECK ONE BOX BELOW) page 8	3. Reason for not generating (CHECK ALL THAT APPLY) Page 10 N/A
1 No 2 LOO 3 SOO 4 CES	3 (SKIP TO SEC. VII)	☐ 1 Never generated ☐ 4 Only non-hazardous waste ☐ 2 Out of business ☐ 5 Periodic or occasional generator ☐ 3 Only excluded or delisted waste ☐ 6 Waste minimization activity ☐ 7 Other (SPECIFY IN COMMENTS)
Sec. VII	On-Site Waste Management S	tatus
A. Storage Instruction	4	B. RCRA treatment, recycling, or disposal Page 11 C. RCRA-exempt treatment, recycling, or disposal Page 12
	<u>. 11.</u>]	
Sec. VIII	Waste Minimization Activity di	
	begin or expand a source activity during 1989 or 1990 page 12	B. Did this site begin or expand a recycling activity during 1989 or 1990 Page 13 C. Did this site conduct a source reduction or recycling opportunity assessment during 1989 or 1990 Page 13
☑ 1 Yes ☐ 2 No		☑ 1 Yes ☐ 2 No ☑ 2 No ☑ 2 No
	rs have limited this site from initiating _L THAT APPLY)	new source reduction activities during 1989 or 1990
02 Ins 03 Lac 04 So 05 Co 06 Tec 07 Per	ck of technical information on source urce reduction is not economically feat ncern that product quality may decline chnical limitations of the production production rmitting burdens. her (SPECIFY IN COMMENTS)	eduction equipment or implement new source reduction practices. eduction techniques applicable to the specific production processes. sible: cost savings in waste management or production will not recover the capital investment. a as a result of source reduction. cocesses.
	rs have limited this site from initiating LL THAT APPLY)	new on-site or off-site <u>recycling</u> activities during 1989 or 1990
☐ 02 Ins	factors have limited new recycling as ufficient capital to install new recyclinimplement new recycling practices. It is not technical information on recycling plicable to this site's specific producticycling not economically feasible: consteminate of the site of the sit	g equipment 08 Technical limitations of product processes inhibit on-site recycling. 09 Technical limitations of production processes inhibit on-site recycling. 10 Permitting burdens inhibit recycling. 11 Lack of permitted off-site recycling facilities. 12 Unable to identify a market for recyclable materials. 13 Other (SPECIFY IN COMMENTS)
Comments:	24 50 13	

~ -1 ~

NONE

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER: SITE NAME MCCORMICK PAINT WORKS 2355 LEWIS AVENUE ROCKVILLE, MARYLAND 20851 EPAID NO. M1D1D101013121418121715	MARYLAND DEPARTMENT OF THE ENVIRONMENT 1990 Hazardous Waste Report FORM GM WASTE GENERATION AND MANAGEMENT					
INSTRUCTIONS: Read the detailed instructions beginning on page 14	of th 1990 Hazardous Waste Report booklet before completing this form.					
Sec. A. Waste description WASTE FLAMMABLE LIQUID N.O. S Instruction Page 15 UN 1993 RQ WASH MINERAL SI	•					
B. EPA hazardous weste code Page 15 D 0 0 1 N/A N/A N/A N/A	C. State hazardous weste code Page 16 Ny/A					
D. SIC code Page 18 E. Source code Page 18 [A Q9]	F. Form code Page 16 B 1 2 1 1 1 System type M 1 N/A 1					
H. TRI constituent Page 17 L CAS numbers Page 17 N/A 1						
Sec. A. Quantity generated in 1989 B. Quantity generated in 1990 C. U. Page 17	CM D. Density age 18 Page 18 E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW? Page 18					
L1111N/A L111519,0,0	[0]6] • [7]0] ☐ 1 Yee (СОМПИЛЕТО SYSTEM 1) [X]1 № (Д1 № (Д2 № (З40 ТО 850. II)					
SYSTEM 1 System type	System 2 System type Quantity treated, disposed or recycled in 1990 Page 16 Page 18 MI 1N/A1 I I I N/IA					
Sec. A. Was this weste shipped off site? 1 Yes (CONTINUE TO BOX 6) 1 1 1 1 1 1 1 1 1						
Site B. EPAID No. of facility to which weste was shipped Instruction Page 19 V A D 0 9 8 4 4 1 3 4 4 3 1 4 1 3 1	D. Total quantity shipped in 1990 Page 19 L 1 L 1 L 15191010					
Site 2 L1111111N/AJ L	MINYA LIIINYALI					
Sec. A. Waste minimization results in 1990 (X1 Yee (CONTINUE TO BOX B) IV Instruction Page 20						
B. Activity Page 21 [W] 1 1	Page 21 Page 22					

PAINT TANK CLEANING IS THE PRINCIPAL SOURCE OF

GENERATED WASTE.

Comments:

Section 1 (F)

Page 3 of 7

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME

MCCORMICK PAINT WORKS COMPANY

2355 LEWIS AVENUE

ROCKVILLE, MARYLAND 20851

EPA ID NO.

*/**. ::::

M D D O O 3 2 4 8 2 7 5



MARYLAND DEPARTMENT OF THE ENVIRONMENT

1990 Hazardous Waste Report

FORM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the d	letalled Instructions beginning on page 14	of th 1990 Hazardous W	aste Report booklet before completing this form.				
EXT							
B. EPA hazardous weste code Page 15	37/2	C. State hazardous weste code Page 16	07/2				
D ₁ O ₁ O ₁ 1	E. Source code Page 18 [A 1 0 1 9]	F. Form code Page 10	G. Origin Pege 18 Code [
Page 17. P			,				
Sec. A Quantity generated in 1989 instruction Page 17	Page 17	UOM Page 18 D. Deneity Page 18 Page 18 N/A • 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
Page 18 Pag	SYSTEM 1 System type Page 18 Page 18 Page 18						
Sec. A. Was this waste shipped off site?	∑ 1 Yes (CONTINUETO BOX B) ☐ 2 No (SKIP TO SEC. M)						
Site B. EPA ID No. of facility to which west Instruction Page 19 LOI H1 D1 01 41 51	Page 19	<u> M. 1. 3. 2</u> 1	0. Total quantity shipped in 1990 Page 18 				
Site 2 (N/A) 1 1 1 1	111111	MIII					
Sec. A. Waste minimization results in 199 instruction Page 20	00 [3(1 Yee (CONTINUE TO BOX B) 2 No (THIS FORM IS COMPLETE) 1 9 9 0						
B. Activity C. Others Page 21 Page 2	offects D. Quantity recycled in according to new	v activities E. Activity/Product Page 21	F. Source Reduction Quantity Page 22				
6.2	Yee <u>N/A </u>	LN/A) •	USED 20 DRUMS (each drum 400#)				
Comments: Section 1 (F) DRY PAINT SKINS, NON	USABLE OIL PAINT	WASTE				

OR ENTER:	RM, ATTACH SITE IDENTI	SOLID WASTE MANAGEMENT
	CORMICK PAINT W 55 LEWIS AVENUE	ORKS COMPANY
	CKVILLE, MARYLA	
EPA ID NO. M	D ₁ D ₁ 0 ₁ 0 ₁ 3 ₁ 2 ₁ 4 ₁ 8	OFF-SITE IDENTIFICATION
WHO MUST COMP	LETE THIS FORM?	Form OI must be completed by every site that shipped hazardous waste off site and every site that received hazardous waste from off site during 1990
	INSTRUCTIONS:	Mark X if you are not required to complete Form OI. Please read the detailed instructions beginning on page 26A! 1990 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form. Complete A through E for each off-site Installation to which you shipped waste or from which you received waste during 1990 Complete A through D for every transporter you used during the reporting year.
		Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. Make and complete additional copies of this form if you need to identify more than four off-site installations or transporters.
1 Instruction page 26	Frankallation of transporter A 5 2 4 3 7 0 6	B. Name of off-sag installation of transporter 26 A ENVIROSAFE SERVICES OF OHIO INC 1 (419) 726-1521
C. Sile type code	D. Sile relationship code Page 26B	E. Address of off-site installation Page 26B 876 OTTER CREEK BOAD Street 876 OTTER CREEK BOAD
<u>[F]</u>	LD)	Cry OREGON State O H Code 4 3 6 1 6 - D K 1
Site A EPAID No. or ori-are instruction page 26	nstallation or transporter \$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	B. Name of off-see initialistion of transporter Page 26A DART TRUCKING COMPANY
C. Site type code Page 26B	D. Site retationship code Page 24	E. Address of off-site installation Page 26B N/A Street
T	D	Cry N/A State [N/A] Zip [N/A] 1 - 1 1
V A D 0 9	Installation of transporter 6 A 8 4 4 3 4 4 3	8. Name of off-site installation of transporter Page 26 A OLDOVER CORPORATION 1 (804) 581-3226
C. Site type code Page 26B	D. Site relationship code Page 26B	Page 26B STATE ROAD 652 P.O. BOX 68
E	LDI	City ARVONIA SIAIO V.J.A Code [2:3:0:0:4] - [D:K]
Site A EPAID No. of off-ane Instruction page 26 V A D 0 4	Installation of transporter	B. Name of off-arte installation of transporter Page 26 A OLDOVER CORPORATION
C. Sile type code Page 26B	D, Site relationship code Page 26B	E. Address of off-site installation Page 26B N/A Street
· [T]	D ,	City N/A State N/A Code N/A
Comments:	NE	
	•	
April 1990 Comment of the Comment of		Page <u>5</u> of <u>7</u>

Form PS () () 11]

Safety & Health Director

MO.

Page 1 of

C. Tille

E. Date of signature

M.I.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE

MDD003248275

MCCORMICK PAINT WORKS INC

Form GM [0] 0 [1]

First name
Karen

Form IC [__1__12]

Glantschnig

II. Plense print: Last name

2355 LEWIS AVE

ROCKVILLE MD 20851 ATTN: ALLISON GORDON

EPA.



MARYLAND DEPARTMENT . OF THE ENVIRONMENT

1989 Hazardous Waste Report

IDENTIFICATION AND CERTIFICATION

FORM IC

· ·	 	·	 ;			
INSTR	UCTIONS: Read the det	ailed instructions beginni	ng on page 7 o	of the 1989 Hazardous	Waste Report bo	poklet before completing this form.
	Site name and location addre different, enter corrections. If				A, B, D, E, F, G, a	and H if same as label; if
A. EPA ID No. Same as ta		. ` 		/company name ne as label 🔯 or ———	•	
C. Has the se	te name associated with this EPA ID chi	-	Yes No			
D. Street name Same as la	a and number. If not applicable, enter in the state of th	ndustnal park, building name or o	other physical local	lion description,		
E. City, town, Same as la	-	F. County MONTGOMER	ξΥ	G. State Same as label ☑ L	H. Zip Code Same as label Zi	
SEC. II	Mailing address of site. Instru	ction page 7.	···	•		
A. Is the mail	ling address the same as the location o	ddress? 🛭 t	Yes (SKIP TO SE No (COMPLETE	•		
B. Number a	nd street name of mailing address					
	*		ì			<u>-</u>
G. Cily, Iown,	village, elc. n/a		· 	D. State n/a . L_L_l	E. Zip Code n/	'a
CEC III	Non-Alleration				a consistent this	Instruction case 7
SEC. III	Name, title, and telephone nu	mber of the person who s	snovia de cont	acted if questions arts	e regarding this	report. Instruction page 7.
A. Please prin	•	rst name	M.I. B.	Title	C. Telephone	
Alli	son Gore	don	- E	xec. V.P.	<u> </u>	1, <u>7,7,0,</u> <u>3,2,3,5</u>
Kans	al Shr	i	B. C	nief Chemist		Extension In la ! !
				•		-
SEC. IV		tite's physical location. Er				ucts, produced or distributed, or lescription includes the combined
Λ	(2,8,5,1)	t <u>Ni t</u> AL	C	(N.) JA.)		NIA'L
	certify under penalty of law th	at I have personally evan	ined and am (amiliar with the inform	nation submitted	in this and all attached
SEC. V	documents, and that based or	my inquiry of those indivacturate, and complete.	iduals immedi	iately responsible for c	obtaining the info	rmation, I believe that the mitting false information, including
	fore page submitted					

Sec. VI	Generator Status		
· Instruction	(CONTINUE TO BOX B) G (SKIP TO SEC. VII)	B. Reason for not generating (CHECK ALL T Page 10 N/A 1 Never generated 2 Out of business 3 Only excluded or delisted waste	☐ 4 Only non-hazardous waste ☐ 5 Periodic or occasional generator ☐ 6 Waste minimization activity
			7 Other (SPECIFY IN COMMENTS)
Sec. VII	On-Site Waste Management	Status .	• • • • • •
A. Storage Instruction	page 11	B. RCRA treatment, recycling, or disposal Page 11	C. RCRA-exempt treatment, recycling, or disposal Page 12
	13	<u>L1</u> 1	LIJ .
Sec. VIII	Waste Minimization Activity d	uring 1988 or 1989	
	e begin or expand a <u>source</u> activity during 1988 or 1989? page 12	B. Did this site begin or expand a recycling activity during 1988 or 1989? Page 13	C. Did this site conduct a source reduction or recyclin opportunity assessment during 1988 or 1989? Page 13
1 Yes		☑ 1 Yes ☐ 2 No	
	rs have limited this site from initiating	new source reduction activities during 1988 of	or 1989?
☐ 02 Ins ☐ 03 La ☑ 04 So ☑ 05 Cc ☐ 06 Te ☑ 07 Pe	ck of technical information on source	reduction equipment or implement new source reduction techniques applicable to the specif asible: cost savings in waste management or re as a result of source reduction.	
	rs have limited this site from initiating	new on-site or off-site <u>recycling</u> activities dur	ing 1988 or 1989?
☐ 02 Ins or or ☐ 03 La ap ☐ 04 Re wa ca ☐ 05 Ca ☐ 06 Re	factors have limited new recycling as sufficient capital to install new recyclin implement new recycling practices. It is technical information on recycling plicable to this site's specific product cycling not economically feasible: constemanagement or production will nepital investment. Income that product quality may decline recycling. Equirements to manifest wastes inhibite for recycling.	g equipment g equipment g techniques on processes. st savings in ot recover the 08 Technical limit for recycling. 99 Techical limit for recycling. 10 Permitting but 11 Lack of permit 12 Unable to ide 13 Other (SPECI	ility provisions inhibit shipments off site for recycling, itations of product processes inhibit shipments off site ations of production processes inhibit on-site recycling, rdens inhibit recycling, itted off-site recycling facilities, ntify a market for recyclable materials. FY IN COMMENTS)
Comments:			

OR ENTER:

SITE NAME

McCormick Paint Works Company

2355 Lewis Avenue

Rockville, Maryland 20851

EPA ID NO.

MLD1 D10 10 13 12 14 18 12 17 15



OF THE ENVIRONMENT

1989 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

Page <u>3</u> of <u>5</u>

INSTRUCTIONS: Read the de	tailed Instructions beginning on page 1	4 of the 1989 Hazardous Waste Report b	ooklet before completing this form.
1 Britishers Lade 19	• •	s. 9189, OIL PAINT WASTE ERAL SPIRIT, ALKYD RESIN	
S. EPA hazardous waste code Page 15		C. State hazardous weste code Page 18	
(D(O(O)1) (N(A) L)	LNAIII INIAIII	LNIALL I L	LNI ALLILI
D. SIC code Page 16	E. Source code Page 18	F. Form code Page 16	G. Origin Page 15 Code [1]
12181511	(A 1 Q9)	<u>18 13 11 19 1</u>	System type (M N A
	numbers 1. N A	┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆ ┆	
<u>2</u> s	·	ه ليا-ليا-ليا-يا ه	
Sec. A. Quartity generated in 1988 Instruction Page 17	8. Quantity generated in 1989 C. Page 17	UOM D. Density E. Was this or discipled in Page 18	s weste treated, disposed or recycled on site sarged to a sewer/POTW? B
1_1 1 1415151010	1 1.1.1.1.15181510101		Yes (CONTINUETO SYSTEM 1) No (SKPTO SEC. III)
SYSTEM 1 System type Quantity Page 18 N/A Page [M	treated, disposed or recycled in 1989	System 2 System type Quantity treated Page 18 N/A Page 18	, disposed or recycled in 1989
Sec. A. Was this waste shipped off site?	1 Yee (CONTINUE TO BOX E) 2 No (SKIP TO SEC. M)		
Site B. EPA ID No. of facility to which wester Instruction Page 18	Page 19	D. Total quantity a Page 19	hipped in 1888 1 1 15181510101
Site N/A		(MI TI C	
Sec. A. Waste minimization results in 1989 IV Instruction Page 20	∑ 1 Yes (CONTINUE TO BOX 8) ☐ 2 No (THIS FORM IS COMPLETE)		
B. Activity C. Othere Page 21 Page 2	_ ,	w activities E. Activity/Production Index F. Page 21	Source Reduction Quantity Page 22
(W:1:4) (W2:2)	N. 3	ıl Ma-u	<u>INI AU IIIIIII</u>
W. W.	No		
Comments: SECTION 1	(F) DRY PAINT SKINS, NOT	NUSABLE OIL PAINT WASTE.	,

OVER --->

<u>. </u>						
BEFORE COPYING FORM, ATTACH SITE IDENTION OR ENTER: SITE NAME MCCORMICK PAINT WORD 2355 LEWIS AVE ROCKVILLE, MD. 2 EPA ID NO. M D D 0 0 3 2 4	0851	FORM IC	MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1988 Hazardous Waste Generation and Shipment Report IDENTIFICATION AND CERTIFICATION			
	······································					
WHO MUST COMPLETE THIS FORM?	·-	eted by every site that rec	-			
INSTRUCTIONS:	Please read the detailed	instructions beginning on	page 8 of 1988 Hazardous Waste Generation			
	and Shipment Report In	structions booklet before	combining mis roun.			
	Complete Sections I the	rough IV and Sections VI ave finished the full report	through IX immediately. Complete Section V, package.			
SEC. Site name and physical location which may	differ from the mailing add	dress. Complete items A t	hrough G.			
I. Mark X for items A, B, C, D, F, and G if san	ne as label; if different, ent	ter corrections. If label is a	absent, enter information.			
A. Site/company name	- 	'8. EPA ID No.	·			
Same as label	አለተ ር ጽ ርግእለ	_	[M ₁ D ₁ D ₁ O ₁ O ₁ O ₂ 3, 2, 4, 8, 2,7,5]			
or → McCORMICK PAINT WORKS CC						
C. Address number and street name of physical location - if not kno Same as label	own, enter Industrial park, building	name or other bulgaren rocerion of	в есприон			
or → 2355 LEWIS AVENUE						
D. City, town, village, etc. E. County	·	F. State	G. Zip Code			
Same as label	•.	Same as label	Same as label			
or → ROCKVILLE MONTO	SOMERY	$or \longrightarrow MD$	$\alpha \longrightarrow [2,0,8,5,1] - [1,1,1]$			
Mailing address of site. Mark X for A, B, C, and D if same as label A Number and street name of mailing address Same as label X	; if different, enter correcti	ons.				
or —			<u> </u>			
B. City, town, vittage, etc.		C. State Same as label	D. Zip Code Same as label X			
Same as labeli X						
07 —>		0 []				
SEC. III. Name, title, and telephone number of the p	person who should be con	tacted if questions arise re	egarding this report.			
A. Please print: Lest name First name			C. Telephone			
KANSAL SHRI		CHIEF CHEMIST EXEC VICE PRES	<u> </u>			
ALLISON GORDON		EXEC AICE LEES	Extension N/A			
SEC. IV. Enter the Standard Industrial Classification services rendered at the site's physical local of the site. SIC codes are listed beginning	ition. Enter more then one	SIC Code only it no one in:	group of products, produced or distributed, or the dustry description includes the combined activities lebook.			
<u> </u>		D	E. F.			
[IN, A, ,	INT 74 I	NIALLI.			
[2 ₁ 8 ₁ 5 ₁ 1] NA	[NIV]	N.A.	MINITED WINE			
SEC V. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.						
A. Please print: Last name First name		M.I.	Title			
GLANTSCHNIG KAREN		Α.	SAFETY & HEALTH DIRECTOR			
B. Signature			Date of signature			
D-14.	Tools		0.5 2.3 8.9 Mg. Day Yr.			
Lyser of File	- warne		Mo. Day Yr.			

SEC. VI.	Does this site's EPA ID authorize hazardous waste generation?
	NO SKIP TO SECTION VII.
X	YES —— Did this site generate any hazardous waste during 1988
	YES
	 \(\times \) \(\times \)
'	Mark [X] If this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 198 or 1988 NO —— CONTINUE BELOW, MARK [X] NEXT TO ALL THAT APPLY.
	Generated, excluded or delisted wastes Generated hazardous waste prior to 88 but do not expect to generate in the future - MARK XIFOR REASON IN ONE BOX BELOW
	 Waste was from one-time event(s) (e.g. spills; remedial actions, etc.) Waste minimization activity undertaken during 1987 1988 Out of business
	 ☐ Generated hazardous waste prior to 8.8 and expect to generate in the future ☐ Never generated before but expect to generate in the future ☐ Never generated and do not expect to generate in the future - MARK ∑FOR REASON IN ONE BOX BELOW
	☐ Protective notifier only ☐ Misunderstood the requirements
l	Notified to secure transportation services
	Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS
SEC. VII.	Does this site have RCRA Interim Status or a RCRA permit to treat, store, or dispose hazardous waste?
	NO
	YES —— Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 1988
-	YES SKIP TO SECTION VIII
74 32: 1	NO —— CONTINUE BELOW, MARK X NEXT TO ALL THAT APPLY
	T/S/D excluded waste during 1988
Ì	T/S/D hazardous waste in exempt units during 1988
	☐ T/S/D hazardous waste prior to 88 but did not T/S/D waste during 88. MARK XIN ONE BOX BELOW ☐ T/S/D will resume in the future
]	Have notified of planned closure
1	Site is in closure or post closure
	NevePT/S/D hazardous waste prior to 38 but: MARK ☒ IN ONE BOX BELOW
<u> </u>	Expect to T/S/D hazardous waste in the future Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMENTS
SEC. VIII.	Do you wish to withdraw this site's generator notification or EPA Part A permit application?
	Withdraw generator notification ☐ Yes X No Withdraw Part A permit application ☐ Yes ☐ No NA
SEC.	Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short term accumulation of hazardous waste?
	□ NO .
	YES DOES THE AREA HAVE: Containers No TY Yes ENTER THE NUMBER OF TANKS AND THEIR TOTAL CAPACITY IN GALLONS.
.	Tanks K No Yes I I I I I I I I I I I I I I I I I
Comr	Number Gallon capacity ments:
	Page 2 of 10

BEFORE COPYIN OR ENTER: SITE NAME				MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1988 Hazardous Waste Report and Shipment Report		
EPA ID NO.	M1D1D1010131	214181275	FORM GS	WASTE GENERATION AND SHIPMENT		
WHO MUST (COMPLETE THIS FO	ORM? Form GS must be compl hazardous waste off site d	eted by every site tha uring 1988	t generated hazardous waste on site or shipped		
	INSTRUCTI	Generation and Shipment Make and complete a pl shipped off site during 1 to	I instructions beginnle Report Instructions boo natocopy of this form 988 oh W. Throughout this	GS. ng on page 12 of the 1988Hazardous Waste obliet before completing this form. for each hazardous waste generated on site or form enter "DK" if the information requested is not applicable.		
Sec. A. Waste design instruction	_{Page 12} éxtenders	mmable solid N.O.S. 91 (clay),contains ignita	189, UN1325, cable mineral s	pil paint waste solidify with spirit, alkyd resin and pigment		
B. EPA hazardous wester Page 12 D O O 1 D. SIC code Page 13	D O O 1 NA					
Sec. A Organics Instruction P High 6 Low 1 Test 1 Note G. pH Page 18 High 1-1 Low 1-1 Note 6	High 9 Low L. J Note N H. Flashpoint Page 18 High 1 3 9 9	.	Page 18 High Low UOM UOM Page 18 K. Rad Page 18 Yes			
Sec. A 87 quantity hazardous waste generated Sec. A 87 quantity hazardous waste generated B. 88 quantity hazardous waste generated C. UOM Page 21 [N] A] • [1] [N] A] • [1] [III A] [II						
IV Instruction	io, of facility to which waste was on Page 22 D 0 4 5 2 4 3	shipments mode Page 22 Page 2	Puge 22	Page 22		
Comments: 5	SEC IV BOX'A CO	ONTINUED ON SUPPLEMENT	TAL PAGE	Page 3 of 10		

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BEFORE COPYING OR ENTER: SITE NAME	M-CODMICK DAINE GODIC COMPANY					MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1988 Hazardous Waste Report and Shipment Report			r	
EPA ID NO.	M, D, D, O, C	13248	<u> </u>		G:		WASTE GENERATION AND SHIPMENT			
WHO MUST C	OMPLETE THIS	S FORM?	Form GS must hazardous waste	be comple e off site de	aring 1988	site that g	jenerated h	nazardous waste	on site or ship	ped
·	Mark ⊠ if you are not required to complete Form GS. INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1988 Hazardous Waste Generation and Shipment Report Instructions booktet before completing trus form. Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1988 Complete Sections I through IV. Throughout this form enter "DK" if the Information requested is not known or is not available; enter "NA" if the Information requested is not applicable.									
Sec. A. Waste descr Instruction f				· -						
B. EPA hazardous waste of Page 12	code	,			C. State hazardous Page 13	waste code	_ _ _			
D. SIC code Page 13										
Sec. A Organics Instruction Particular Low	High L	C. Total Page High Low Note I. Cyar Page High Test	15 F	Suspended So Page 15 High Low	Page 16 Fligh 1 Low 1 UOM			F. Toxic Metals Page 18 Metal 1 3 4 5 6	Note LJ High Low LJ	
Sac. A 87 quantity hazardous waste generated instruction Page 20 B. 88 quantity hazardous waste generated instruction Page 20 C. UOM Page 21 Page 21 Instruction Page 20 F. Quantity hazardous waste remaining on site on December 31, 1988 Page 21 F. Quantity hazardous waste remaining on site on December 31, 1988										
Instruction	of facility to which waste Page 22 0 0 0 7 2 4		B. Number of shipments Page 22	C. Transpo mode Page 22	Page 2	T/S/D/R coo 2		. Total quantily shipp Page 22	, ,6 ,5 ₁ 0 ,	
Comments: SE	C IV BOX A	CONTINUE	D ON SUPPL	EMENTA	L PAGE			p	age ⁴ o	10

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OR ENTER: SITE NAME M <u>CC</u> 235	ORM, ATTACH SITE IDENTI ORMICK PAINT WO 5 LEWIS AVE CKVILLE, MD. 208	RKS COMPANY SOLID WASTE MANAGEMENT ADMINISTRATION 1988 Hazardous Waste Generation				
EPA ID NO. M	D ₁ D ₁ 0 ₁ 0 ₁ 3 ₁ 2 ₁ 4 ₁ 8	OFF-SITE IDENTIFICATION				
WHO MUST COMP	LETE THIS FORM?	Form OI must be completed by every site that shipped hazardous waste off site and every site that received hazardous waste from off site during 1988				
	INSTRUCTIONS:	Mark X if you are not required to complete Form OI. Please read the detailed instructions beginning on page 23 of 1988 Hazardous Waste Generation and Shipment Report Instructions booklet before completing this form. Complete A through E for each off-site Installation to which you shipped waste or from which you received waste during 1988 Complete A through D for every transporter you used during the reporting year. Throughout this form enter "DK" if the Information requested is not known or is not available; enter "NA" if the information requested is not applicable. Make and complete additional copies of this form if you need to identify more than four off-site installations or transporters.				
Site A. EPA ID No. of off-site Instruction page 23	installation or transporter	Name of off-site Installation or transporter Page 23 Third Third				
O_H_D_0_4	5 2 4 3 7 0 6	ENVIROSAFE SERVICES OF OHIO, INC E. Address of off-site Installation				
Page 24	Page 24	Page 24 876 OTTER CREEK ROAD				
<u>L</u> FJ	<u>L D</u> j	City OREGON State O H Zip Code 4, 3, 6, 1, 6				
Site A. EPA ID No. of off-site 2 Instruction page 23	s installation or transporter	Name of off-site installation or transporter Page 23				
	10 17 12 14 18 13 11	MICHIGAN DISPOSAL				
C. Site type code Page 24	D. Site relationship code Page 24	E. Address of off-site Installation Page 24 Street 49350 N. 194 SERVICE DRIVE				
F	LD)	City BELLEVILLE State M. I. Zip 4,8,1,1,1				
Site A. EPA ID No. of off-altr 3 Instruction page 23	e installation or transporter	B. Name of off-site installation or transporter Page 23				
	<u> </u>	HORWITH TRUCKS, INC.				
C. Site type code Page 24	D. Site relationship code Page 24	E. Address of off-site Installation Page 24				
l m i	ln.	Street NA				
T	D	CityStateStateStateStateStateStateStateStateStateStateStateStateStateStateStateStateStateState				
Site A EPA ID No. of off-att. 4 Instruction page 23	e installation or transporter	Name of off-site installation or transporter Page 23				
C. Site type code	D. Site relationship code	E. Address of off-site installation				
Page 24	Page 24	Page 24				
	LJ	Streel Zip Code				
Comments:						

BEFORE COPYING FORM, ATTA OR ENTER:	ACH SITE IDENTIFIC	CATION LABEL		SOLID WASTE MANAGEMENT ADMINISTRATION				
2355 L	ICK PAINT W EWIS AVE LLE, MD, 20	ORKS COMPANY 851		1988 Hazardous Waste Report and Shipment Report				
EPA ID NO. M, D, D	0,0,3,2,4,8	<u> </u>	FORM	WASTE MINIMIZATION				
	·		WM	PART I				
WHO MUST COMPLETE	THIS FORM?	he completed by all name	erators required to file ar to statutory provisions	implement waste minimization programs, must n Annual/Biennial Report. This requirement was included in the Hazardous and Solid Waste				
NOTE: Generators shipping hazardous waste off site are required to certify, on item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.								
INS	TRUCTIONS:	Please read the detailed Shipment Report Instruction	instructions on page 25 ons booklet before comp	of 1 1988 Hazardous Waste Generation and letting this form.				
	orm enter "DK" if the information requested is not tion requested is not applicable.							
1. Did this site creat	e or expand a s	ource reduction and re						
		1988 Yes No	1987 Yes N	Prior Years lo Yes No				
	Create	X \square	X [
	Expand							
Did this site have recycling of haza	a <u>written</u> policy rdous waste?	or statement that outlin	·	s and methods for source reduction and				
,		1988	1987	Prior Years				
·	Yes		LJ					
	No	L <u>X</u>	· X	<u> X</u>				
What was the dol reduction and red	lar amount of ca	dous waste? ENTER Z	nt and equipment) a ERO (0) IF NONE.	and operating costs devoted to source				
		1988	. 1987 \$ 0	Prior Years \$ 0				
•	expenditures	\$ <u>0</u>	\$0 e 0	• 0				
Ор	erating costs	\$	\$	\$ <u>`</u>				
4. Did this site have to identify and Im	an employee tr plement source	reduction and recyclin	ng opportunities and	,				
•		1988 Yes No	1987 Yes N	Prior Years No Yes No				
1	Training	\(\overline{x}\) \(\overline{x}\)	K [
	Incentives							

Page 6

Page 7 of 10

5.	assassi	ment d	conduct a source reductl or audit is a procedure th aste or the quantity whic	nat identlifie h must sul 198	es practices t bsequently b 38	hat can be Ir e treated, sto 1 9 8	nplemente ored or disp 7	d to reduce the posed. Prior Ye	e generation of
				Yes	No	Yes	No.	Yes	No
			Site-Wide		X		X		<u>X</u>
			Process-Specific	X		X		X	
6.			dentify or implement nev s waste generated at this		E REDUCTIO	N opportunit	tles to redu	ice the volume	and/or toxicity
				19	88	198	87	Prior Y	ears
				Yes	No	Yes	No	Yes	No
			Identify		X		X		X
			Implement	X		X		X	
7.	TO AU	a. b. c. d. e. f. g.	Insufficient capital to inspractices. Lack of technical inform processes. Source reduction is not will not recover the cap Concern that product question to the content of	stall new s nation on s economic ital investr juality may the produ	cource reduct source reduct cally feasible: ment. y decline as a action process	ion equipme tion techniqu cost saving result of sou ses.	ent or imple ues, applica gs in waste urce reduct	ement new sou able to my spe management of tion.	rce reduction cific production or production
8.			identify or implement ne ated at this site or subse			, or disposed	d of on site		exicity of hazardous
	-				88	19		Prior Y	=
		•		Yes	No	Yes	No C	Yes	No
			Identify		[X]	닏	X		<u>K</u> _
			Implement		X	L	X	Ц	K
						•			

Page 8 of 10

EPA ID NO) .	M,D,D,0,0,3,2,4,8,2	2,7,5					
9.		at factors have delayed or pi	revented impi	ementation of c	n-site or off-site	RECYCLING	opportunities.	MARK 🗓
		a. Insufficient capital	to Install new	recycling equi	ment or impler	nent new recy	cling practices.	
		b. Lack of technical in processes.	nformation o	n recycling tech	niques applicat	ole to this site's	s specific produ	ction
		c. Recycling is not ed will not recover the	conomically for	easible: cost sa	vings in waste	management o	or production	
		d. Concern that prod	•		result of recycli	ng.		
· · · · · · · · · · · · · · · · · · ·		e. Requirements to m	nanifest waste	es inhibit shipm	ents off site for	recycling.		ï
	X	f. Financial liability p	rovisions inhi	lbit shipments o	ff site for recycl	Ing.	-	
		g. Technical limitation	ns of product	processes inhi	bit shipments o	ff site for recyc	eling.	
		h. Technical limitation	ns of product	lon processes i	nhibit on-site re	cycling.	· ·	
		i. Permitting burden	s inhibit recy	cling.		•		
1		j. Lack of permitted	off-site recyc	ling facilities.				
		k. Unable to identify	a market for	recyclable mate	riais.			
		I. Other (SPECIFY)					<u> </u>	
10.	10. Has this site requested or received technical information or financial assistance on source reduction and/or recycling practices from any of the following sources? MARK X NEXT TO ALL THAT APPLY.							
			1 9 Technical	988 Financial	1 9 Technical	87 Financial	Prior ` Technical	Years Financial
	a.	Local government					recinical	.
	b.	State government					Ä	
	· C.	Federal government						П
	ď.	Trade associations	$\overline{\mathbf{x}}$		X		K	
,	e.	Educational institutions						
	f.	Suppliers						
	g.	Other parts of your firm						
	h.	Other firms/consultants						
	l.	No request made	(X		x		\mathbf{x}	
	j.	Other (conferences, literatuetc.)	ıre, X		X		X	
C	omme	onte:		-		:		
	J1111111	cius.						

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL MDD003248275 MCCORMICK PAINT WORKS INC **FORM** 2355 LEWIS AVE ROCKVILLE MD 20851 ATTN: ALLISON GORDON Form IC must be completed by every site that received this package. WHO MUST COMPLETE THIS FORM? Please read the detailed instructions beginning on page 8 of the 1987 Hazardous Waste Generation and Management Report Instructions booklet before completing this form. **INSTRUCTIONS:** Complete Sections I through IV and Sections VI through IX Immediately. Complete Section V,

MARYLAND HAZARDOUS AND **SOLID WASTE MANAGEMENT ADMINISTRATION**

1987 Hazardous Waste Generation and Management Report

> . IDENTIFICATION AND CERTIFICATION



Site name and physical location			package.
SEC. Mark X for Items A, B, C, D, F,	n which may differ from the mailing addra , and G if same as label; if different, enter	ess. Complete items A to corrections. If label is a	ihrough G. absent, enter information.
A. Site/company name Same as label	,	B. EPA ID No. Same as label	
of		or →	
C. Address number and street name of physical foce Same as label Of ——	ation - if not known, enter industrial park, building na	me or other physical location d	escription
D. City, town, village, etc.	E. County		G. Zip Code
Same as label	MONTGOMERY	Same as label 🔀	Same as label
or —		or <u> </u>	« — <u> </u>
SEC. Mailing address of site. Mark X for A, B, C, and D if sa	ame as label; if different, enter correction	3.	
A. Number and street name of mailing address Same as label	· i	, s	
8. City, town, village, etc. Same as label		C. State Same as label	D. Zip Code Same as label
or —	•	<u> </u>	α
SEC. III. Name, title, and telephone nu	mber of the person who should be contain		
	and the last		C. Telephone
A. Picase print: Last name	First name ; M.L. B.	Title -	,
_	1		301 770-3235
_	1	Exec V.P	
SEC. Enter the Standard Industrial	Classification (SIC) Code that describes	the principal products,	301 770-3235
SEC. Enter the Standard Industrial	Classification (SIC) Code that describes	the principal products,	group of products, produced or distributed, or the dustry description includes the combined activities
SEC. IV. Enter the Standard Industrial services rendered at the site's of the site. SIC codes are listed B.	Classification (SIC) Code that describes physical location. Enter more than one Slid beginning on page 1 of the 1987 Hazar	the principal products,	group of products, produced or distributed, or the dustry description includes the combined activities
SEC. Enter the Standard Industrial services rendered at the site's of the site. SIC codes are lister	Classification (SIC) Code that describes physical location. Enter more than one Slid beginning on page 1 of the 1987 Hazar	the principal products,	group of products, produced or distributed, or the dustry description includes the combined activities
SEC. Enter the Standard Industrial services rendered at the site's of the site. SIC codes are listed. A. B. Z. 8, 5, 1	Classification (SIC) Code that describes physical location. Enter more than one Slind beginning on page 1 of the 1987 Hazar c. D.	the principal products, C Code only if no one in dous Waste Generation	group of products, produced or distributed, or the dustry description includes the combined activities
SEC. Enter the Standard Industrial services rendered at the site's of the site. SIC codes are listed. A. B. E. SEC. SEC. SEC. SEC. SEC. I certify under penalty of law that based on my inquiry is true, accurate, and complete.	Classification (SIC) Code that describes physical location. Enter more than one Slind beginning on page 1 of the 1987 Hazar c. D.	the principal products, C Code only if no one in dous Waste Generation	group of products, produced or distributed, or the dustry description includes the combined activities s. Shipment and Management Report Codebook. E. F
SEC. Enter the Standard Industrial services rendered at the site's of the site. SIC codes are lister and that based on my inquiry is true, accurate, and complete and imprisonment. A. Please print: Last name	Classification (SIC) Code that describes physical location. Enter more than one SI debeloning on page 1 of the 1987 Hazar c. D. that I have personally examined and amford those individuals immediately responsite. I am aware that there are significant	the principal products, C Code only if no one in dous Waste Generation	group of products, produced or distributed, or the dustry description includes the combined activities s. Shipment and Management Report Codebook. E. F
SEC. Enter the Standard Industrial services rendered at the site's of the site. SIC codes are lister. A. B. [Z,8,5,1] Certify under penalty of law to and that based on my inquiry is true, accurate, and complete and imprisonment. A. Please print: Last name	Classification (SIC) Code that describes physical location. Enter more than one Slid beginning on page 1 of the 1987 Hazar c. D. that I have personally examined and am first those individuals immediately responsite. I am aware that there are significant	the principal products, C Code only if no one in dous Waste Generation	group of products, produced or distributed, or the dustry description includes the combined activities s. Shipment and Management Report Codebook. E. F

SEC. VI.	Does this site's EPA ID authorize hazardous waste generation?
	NO SKIP TO SECTION VII.
	YES —— Did this alte generate any hazardous waste during 1987?
	YES — READ DETAILED INSTRUCTION ON PAGE 4 OF THE 1987 HAZARDOUS WASTE GENERATION AND MANAGEMENT; ENINSTRUCTIONS BOOKLET FOR ACUTE AND ACCUMULATION LIMITS. MARK [X] NEXT TO THE HAZARDOUS WAS GENERATION QUANTITY CATEGORY THAT APPLIED TO THIS SITE DURING 1987.
	Category 1: More than 1000 kg (2,200 lb) in one or more months Category 2: More than 100 kg (220 lb) but no more than 1000 kg (2,200 lb) in any single month Category 3: No more than 100 kg (220 lb) in any single month
٠	Mark X if this site changed from Category 1 to Category 2 or 3 due to waste minimization activity conducted during 18 or 1987.
	NO —— CONTINUE BELOW, MARK X NEXT TO ALL THAT APPLY. Generated, excluded or delisted wastes
,	Generated hazardous waste prior to 1987 but do not expect to generate in the future - MARK X FOR REASON IN ONE BOX BELC Waste was from one-time event(s) (e.g. spills, remedial actions, etc.) Waste minimization activity undertaken during 1986 or 1997
	☐ Out of business ☐ Generated hazardous waste prior to 1987 and expect to generate in the future ☐ Never generated before but expect to generate in the future ☐ Never generated and do not expect to generate in the future - MARK ☒ FOR REASON IN ONE BOX BELOW
	Protective notifier only Misunderstood the requirements Notified to secure transportation services
SEC	Other EXPLAIN REASON FOR GENERATOR NOTIFICATION IN COMMENTS
SEC. VII.	Does this site have RCRA interim Status or a RCRA permit to treat, store, or dispose hazardous waste?
	NO SKIP TO SECTION VIII
X	YES —— Did the site treat, store, or dispose (T/S/D) hazardous waste in RCRA-regulated units during 1987?
	YES —— SKIP TO SECTION VIII
	NO —— CONTINUE BELOW, MARK [X] NEXT TO ALL THAT APPLY T/S/D excluded waste during 1987
	☐ T/S/D hazardous waste in exempt units during 1987
	☐ T/S/D hazardous waste prior to 1987 but did not T/S/D waste during 1987. MARK [X] IN ONE BOX BELOW ☐ T/S/D will resume in the future ☐ Have notified of planned closure ☐ Site is in closure or post closure
	Never T/S/D hazardous waste prior to 1987 but: MARK(X) IN ONE BOX BELOW
	Expect to T/S/D hazardous waste in the future Do not expect to T/S/D hazardous waste in the future - EXPLAIN REASON FOR INTERIM STATUS OR PERMIT IN COMMEN
SEC. VIII.	Do you wish to withdraw this site's generator notification or EPA Part A permit application?
	Withdraw generator notification ☐ Yes ☑ No
	Withdraw Part A permit application ☐ Yes ☑ No
SEC.	Does this site have an area not requiring a RCRA Part A or Part B permit that is used exclusively for the short te accumulation of hazardous waste?
	⊠ NO
	YES DOES THE AREA HAVE: Containers No Yes ENTER THE NUMBER OF TANKS AND THEIR TO ASCAPACITY IN GALLONS. Tanks No Yes
	Number: 3
Comm	APR 1 1 1988
	Haple Division

MARYLAND HAZARDOUS AND BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL SOLID WASTE MANAGEMENT OR ENTER: ADMINISTRATION McCORMICK PAINT WORKS COMPANY SITE NAME 2355 LEWIS AVE 1988 Hazardous Waste Report ROCKVILLE, MD. 20851 and Shipment Report **FORM** IМ. D. D. O. O. 3, 2, 4/8, 2 EPAID NO. **WASTE MINIMIZATION PART II** Form WM Part II must be completed only by generators that engaged in an activity during 1987 that WHO MUST COMPLETE THIS FORM? resulted in waste minimization. Waste minimization means: (1) reduction in the volume and/or toxicity of hazardous waste generated as a result of source reduction; and/or, (2) reduction in the volume and/or toxicity of hazardous waste subsequently treated, stored, or disposed as a result of on-site or off-site recycling. Mark ⊠ and do not complete this form if no waste minimization results were achieved during 1987. Please read the detailed instructions beginning on page 26 of 1988 Hazardous Waste **INSTRUCTIONS:** Generation and Shipment Report Instructions booklet before completing this form. Make and complete a photocopy of this form for each hazardous waste minimized in 1988 Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. D. Product or service EPA hazardous waste code C. Product or service description State hazardous waste code SIC code Instruction Page 27 Page 27 Page 27 G. Density I. Source code Waste form code UOM H. Source description: Page 28 Page 27 Page 28 Page 28 87 quantity generated B. 88 quantity generated C. Production ratio D. Toxicity change code Sec. Page 31 Instruction Page 29 Page 29 E. Waste minimization: recycling F. Waste mi imization; source reduction Page 31 Page 32 Quantity prevented 2. | | Sec III Narrative description of waste minis nization project or activity and results achieved Instruction Page 39 Page of 10

 What effect did this site's source reduction and/or recycling activity have on the quantity of water effluent produced by hazardous waste generation processes during 1988 	
a. Increase in the quantity of water effluent	1
b. Descease in the quantity of water effluent	•
c. No effect on the quantity of water effluent	1
d. Don't know	
2. What effect did this site's source reduction and/or recycling activity have on the toxicity of water effluent proby hazardous waste generation processes during 1988	duced
a. Increase in the concentration of hazardous constituents	ł
b. Decrease in the concentration of hazardous constituents	
C. No effect on the concentration of hazerdous constituents	
d. Don't know	
3. What effect did this site's source reduction and/or recycling activity have on the quantity of air emissions produced by hazardous waste generation processes during 1988 a. Increase in the quantity of air emissions b. Decrease in the quantity of air emissions c. No effect on the quantity of air emissions d. Don't know	
a. Increase in the quantity of air emissions .	_
b. Decrease in the grantity of air emissions	
c. No effect on the quantity of air emissions	
d. Don't know	
d. Don't know 4. What effect did this site's source reduction and/or recycling activity have on the toxicity of the air emissions produced by hazardous waste generation processes during 1988	ŗ
a. Increase in the concentration of hazardous constituents	
b. Decrease in the concentration of hazardous constituents	
c. No effect on the concentration of hazardous constituents	\setminus \mid
d. Don't know	
Comments:	
Page 10	

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2355 LEWIS	TE IDENTIFICATION LABI PAINT WORKS C AVE ROCKVILLE MD	FORM	SOLID 1987 l a	LAND HAZARDOUS WASTE MANAGEN ADMINISTRATION Hazardous Waste Re and Shipment Report	eport			
GS WASTE GENERATION AND SHIPMENT								
WHO MUST COMPLETE THIS		nust be complet waste off site duri	ed by every site thaing 1987.	at generated ha	zardous waste on site of	shipped		
	Mark⊠if yo	ou are not require	d to complete Form	GS.	** *** *** *** ***			
INSTRUC		d the detailed i and Shipment Re	instructions beginnle sport instructions bo	ng on page 12 oklet before com	2 of the 1987 Hazardon pleting this form.	us Waște		
	Make and		tocopy of this form	•	dous waste generated o	n site or		
	Complete S known or is	ections through not available; en	N. Throughout this	form enter "DK" ation requested	if the information reques is not applicable.	ted is not		
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B. EPA hazardous moste code Page 12			State hazardous waste cod	5		4		
12000T	NA LN	.	I NA	I LIINA				
D. SIC code Page 13 [2[5]]	E. Souice code Page 13	1	Waste form code Page 13	H1811)	G. Waste minimization results Page 13	<u>A</u>		
Sèc. A. Organica II. Water Page 15	C. Total Solids	D. Suspended Solids	E. BTU		F. Toxic Metals	,		
High N High L	нат А	Page 15 ** High []	Page 18		Page 18 Note (A)	ow Tasi		
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Test F Note Note N	Note L.	Note	UOM L	Note D	2 L_L L L	لصبا لد		
G. pH H. Flashpoint Page 18	L Cyanides Page 18	J. Halogens Page 20	K. Radios Page :		ــــــــــــــــــــــــــــــــــــــ	 		
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Sec. A. 1866 quantity hazardous waste generate instruction Page 20	8. 1987 quantity h	szardous wasla ganere	ned .	C. UOM Page 21	D. Density Page 21			
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E. Quantity hazardous weste on site on January 1, 19 Page 21	67	F. Qua	ntily hazardous waste remi	lining on site on Duc		<u></u>		
<u> </u>			<u></u>	ن فعد	· · · · · · · · · · · · · · · · · · ·			
Suc. A. EPA ID No. of facility to which waste was IV Instruction Page 22	anipped S. Number of shipments Page 22	C. Transport mode Page 22	D. Off-bile T/S/D/R co		quantity shipped • 22			
M: 110101016161311	1 -	ļ ·	M. 7.2, M	29 _	3	<u>z</u>		
	ASTE ALLOWED			LITATE WA	STE MINIMIZATI	(جره		
SOLIDIEND WITH CLAY	M3 -CLURA SOU And Differed	RAT DECA			- REMAINING SL	uba 6		

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of

BEFORE COPYING FORM, ATTACH SITE OR ENTER: SITE NAME McCornics Page	57 Weckes Co Rockville Mo 20		1987 FORM	IYLAND HAZARDOUS AND ID WASTE MANAGEMENT. ADMINISTRATION Hazardous Waste Generation and Management Report ASTE GENERATION AND			
WHO MUST COMPLETE THIS FORM? Form GM must be completed by every site that generated hazardous waste on site or shipped hazardous waste off site during 1987. Mark Sif you are not required to complete Form GM. INSTRUCTIONS: Please read the detailed instructions beginning on page 12 of the 1987 Hazardous Waste Generation and Management Report Instructions booklet before completing this form. Make and complete a photocopy of this form for each hazardous waste generated on site or shipped off site during 1997. Complete Sections I through IV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.							
B. EPA hazardoù waste code Page 12 D. G.C. J. P. G.C. J. E. S. C. S.C. Code		C. State har. Page 13	Antique weste code	A SOLVENT			
Sec. A Crganice Instruction Page 14 High IN High Low P Low Note IN Note IN High Page 18 G. pH Page 18 High IN H. Flashpoind Page 18 High IN High IN IN Page 18 Note IN Note IN IN Page 18		n (A) Ha r (B) Lo	\$6.18	F. Tank Métals Page 18 Note Metal High tow Test 1			
Sec. A 1988 quantity generated instruction Page 20 F. On-site T/S/D/R code Page 21 1. FO 1 2. Fig. 3. Sec. A EPA ID No. of facility to which weste was shipp	B. 1987 quantity generated Page 20		ge 21	On-alle			
1V Instruction Page 22 M_1_D, 0, 9, 4, 9, 6, 3, 1, 9	SUDGE SO	Page 23 Page 23 M	17,2, M,2,0 [COURT DECATED			

Page 3

WHO MUST COMPLETE THIS FORM? Form Ol must be completed by every site that shipped hazardous waste off site and received hazardous waste form off site during 1937. Mark (2) if you are not required to complete Form Ol. Please read the detailed instructions beginning on page 27 of the 1987 Haz Generation and Managament Report Instructions booklet before completing this for Complete A through E for each off-site installation to which you shipped waste or freecleved waste during 1987. Complete A through E for each off-site installation to upon used during the reporting year. Throughout this form enter 'DK' if the Information requested is not applicable. Make and complete additional form if you need to licentify more than four off-site installations or transporter. Site A	23	isstevs Aic Ko	FORM	1987 Hazardous Waste Generation and Management Report				
INSTRUCTIONS:	EPA ID NO.	DP0013121418	275	01	OFF-SITE IDENTIFICATION			
C. Site type code D. Site relationship code Page 28 Page 29 Page 29	WHO MUST COME	2 7.	Mark X if you are not required to complete Form OI. Please read the detailed instructions beginning on page 27 of the 1987 Hazardous Waste Generation and Management Report Instructions booklet before completing this form. Complete A through E for each off-site installation to which you shipped waste or from which you received waste during 1987. Complete A through D for every transporter you used during the reporting year. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable. Make and complete additional copies of this					
Site A	1 Instruction page 27		Page 21 Cham D.	•	-			
C. Site type code Page 28 D. State relationship code Page 28 Street City State City St	<u> </u>	Page 28	Page 26 Street City		Zip Code			
Page 28 Street City State City Code			Page 27		·			
C. Site type code D. Site relationship code E. Address of off-site installation Page 28 Street City State Code	Page 28		Page 28 Street	State []	Zip Code []			
Page 28 Page 28 Street City State City State City State City State Code Instruction page 27 C. Sile type code Page 28 Street C. Sile type code Page 28 Street City State City Sta	Site A EPA ID No. of off-site instruction page 27	Installation or transporter	Name of off-site Installation or transportage 27	der .				
Page 25	Page 28	Page 28	Page 28 Street		Zip Code [
Chy State Zip Code	C. Site type code Page 28	D. Site relationship code Page 25	E. Address of off-site Installation Page 28	·	•			
Comments:				State [Zīp Code			
Page 5	Comments:				Page _5_ ol			

MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT

ADMINISTRATION

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME

Mc Ceamer Paist Works Co

BEFORE COPYING FORM, ATTACH SITE IDENTIFOR OR ENTER: SITE NAME McCormice Paint W 2355 Lewis Ate Co	revive MD 20851	FORM WM	MARYLAND HAZARDOUS AND SOLID WASTE MANAGEMENT ADMINISTRATION 1987 Hazardous Waste Generation and Management Report WASTE MINIMIZATION PART I					
WHO MUST COMPLETE THIS FORM?	 be completed by all gener 	ators required to file an A o statutory provisions in	nplement waste minimization programs, must unusi/Biennial Report. This requirement was icluded in the Hazardous and Solid Waste					
NOTE: Generators shipping hazardous waste off site are required to certify, on item 16 of the Uniform Hazardous Waste Manifest, that they have a program in place to reduce, to the degree determined economically practicable, the volume and toxicity of hazardous waste generated. A similar certification must also be made by generators who have obtained a RCRA treatment, storage, or disposal permit. Consistent with these certification requirements, generators must report, on Form WM Part I, the efforts undertaken to implement waste minimization programs.								
INSTRUCTIONS:	Please read the detailed in Management Report Instru-	natructions on page 29 o ctions booklet before com	f the 1987 Hazardous Waste Generation and pleting this form.					
	Answer questions 1 through known or is not available; e	h 10. Throughout this formation	n enter "DK" if the information requested is not n requested is not applicable.					
Did this site create or expand a second content of the second	source reduction and rec	ycling program?						
·	1987 Yes No	1986 Yes No	Prior Years Yes No					
Create			N U					
Expand								
Did this site have a <u>written</u> policy recycling of hazardous waste?	y or statement that outlin	ed goals, objectives a	and methods for source reduction and Prior Years					
Yes	· 🗆							
No	X							
What was the dollar amount of creduction and recycling of haza	capital expenditures (plan rdous waste? ENTER ZE 1987	nt and equipment) and ERO (0) IF NONE. 1986	d operating costs devoted to source Prior Years					
Capital expenditures	\$ 1307	\$ NZ	\$NA					
Operating costs	\$ 50,000	\$ 50,000	\$ 50,000					
· 4. Did this site have an employee to identify and implement source	raining program or provi e reduction and recycling 1987	de Incentives (bonuse g opportunities and a 1986	es, awards, personal recognition, etc.) ctivities? Prior Years					
	Yes No	Yes No	Yes No					
Training								
Incentives			Page 6_of_11					

							e de la particiona	•	<i>,</i> .
5.	assessment	conduct a source re or audit is a procedu vaste or the quantity	ure that ident	lifies practice	s that can be l	implemented	d to reduce t	ite: an oppo the generatic	rtunity on of
	VUU V	or and quantity	•	subsequentry 987	y de treated, si 198	·	•	Years	
			Yes	987 No	198 Yes	86 No	Yes	Years No	•
•		Site-Wide	ļ, M	<u> </u>		_	[X]		
•][][••
		Process-Specific		Ш		LJ ·		Ш	
	•		•			-			
			•	•					•
6. 		dentify or implements waste generated a		CE REDUCT.	ION opportuni	itles to redu	ce the volun	ne and/or to	xicity
		•	4	987	198	16	Prior	Years	
			Yes	No	Yes	No No	Yes	No	
		ldentify	ال				\boxtimes		•
		Implement	. [.][冈		
		mpontatit	· ·	Ш	L	Ш	لکا	Ш	
7.	TO ALL THA a. b. c. d. d.	Insufficient capital of practices. Lack of technical in processes. Source reduction is will not recover the Concern that production in the concern that production is the concern that pre	to install new information or is not econom a capital inves luct quality mans of the proc	r source redu n source redu nically feasibl stment. ay decline as	uction equipme uction techniquile: cost saving s a result of sou	ent or Implenues, applications	ment new so able to my sp management	ource reducti pecific produ	lon
	f.	Permitting burdens	s. ·	. •					
•	g.	Other (SPECIFY)							
8.	Did this site waste gene	identify or implement rated at this site or s Identify Implement	subsequently	CLING opportreated, store 1987 No	ed, or disposed 198 Yes	d of on site o	or off site? Prior Yes X	Years No	ażardous
Administra-	Ele I				•		- 18-18 j		
				· .	REC	FIVI	الأليا		
A Property	Maria de la Companya del Companya de la Companya del Companya de la Companya de l	Take 1				K 1 1 7005	M. a. america		
A COLUMN	Self-interes	Minute it as		•	AF	فأمين	DIMINE	Page 7	of <u> </u>

BEFORE COPYING FORM, ATTACH SITE IDENTIF	!		MARYLAND HAZAI SOLID WASTE MA	NAGEMENT				
SITE NAME McCornice Paiss	1.		ADMINISTRA 1987 Hazardous Was and Managemei	ste Generation				
EPAID NO. MIRITIONS 3121418	; 3,2,7,5	FORM	WASTE MINIM					
	<u></u>	AA IAI	PART I	!				
WHO MUST COMPLETE THIS FORM?	e completed only by gene ization.	rators that engaged in an activi	ty during 1987 that					
	reduction; and/or, (2) reduction in the vol	ns: Ime and/or toxicity of hazardous waste generated as a result of source Ime and/or toxicity of hazardous waste subsequently treated, stored, or 1-site or off-site recycling.						
	Mark 🛛 and do not com	plete this form if <u>no</u> waste	minimization results were achie	eved during 1987.				
INSTRUCTIONS:	Please read the detail Generation and Manage	led instructions beginning ement Report Instructions I	g on page 30 of the 1987 pooklet before completing this	Hazardous Waste form.				
	. Make and complete a p	hoto∞py of this form for e	ach hazardous waste minimize	d In 1987.				
Complete Sections I through iV. Throughout this form enter "DK" if the information requested is not known or is not available; enter "NA" if the information requested is not applicable.								
Sec, A. EPA hazardous waste code Instruction Page 31 B. State hazardou Page 31	Page 31	service description		D. Product or service SIC code				
Popilii I N	3 7	يعابي ألاطهر	PACTURE	Page 31 [2 ₁ 8 ₁ 5 ₁ i]				
E. Wasta form code F. UOM G. Density Page 32 Page 32	H. Source desc Page 32	cription:		I, Source code Page 32				
	[5 ₁] Cite	אריובל אוגושפ היובל אוצושפ	TAILS					
Sec. A. 1988 quantity generated B. 1987 quantity instruction Page 33 Page 33	y generaled C.	Production ratio Page 33	D. Toxicity change code Page 35					
	3.7	L.II.II.3	l	ଠା				
E. Waste minimization: recycling Page 35		F. Waste minimization: source re- Page 36	fuction	,				
Code Cuantity recycled Code Countity prevented 1. 2. 1. 2. 3. 1. 1. 5								
Sec. A Narrative description of weste minimization project or activity and results achieved instruction Page 43 MIX TO MINIMIZE TANK CLEANING								
			 	9 01 11				

Sec. IV.	ins:	tructi inted or	DINS: Answer questions 1 through 4. Mark XI next to the effects produced by the source reduction and/or recycling activity in this form in Sections I through iii.
1.	What e	ffect o	did this site's source reduction and/or recycling activity have on the quantity of water effluent hazardous waste generation processes during 1987?
	· 🗀	a.	Increase in the quantity of water effluent
		b.	Decrease in the quantity of water effluent
	X	c.	No effect on the quantity of water effluent
		d.	Don't know
2.	What e	offect ardou	did this site's source reduction and/or recycling activity have on the toxicity of water effluent produced is waste generation processes during 1987?
		a.	Increase in the concentration of hazardous constituents
		b.	Decrease in the concentration of hazardous constituents
•	X	c.	No effect on the concentration of hazardous constituents
		d.	Don't know
3.			did this site's source reduction and/or recycling activity have on the quantity of air emissions y hazardous waste generation processes during 1987?
		a.	Increase in the quantity of air emissions
		b.	Decrease in the quantity of air emissions
	X	c.	No effect on the quantity of air emissions
		d.	Don't know
4.			did this site's source reduction and/or recycling activity have on the toxicity of the air emissions by hazardous waste generation processes during 1987?
		a.	Increase in the concentration of hazardous constituents
		b.	Decrease in the concentration of hazardous constituents
3	\boxtimes	c.	No effect on the concentration of hazardous constituents
		d.	Don't know
	Commer	nts: No	DEC. VED
			APR 11 1988
ŀ			APR 11

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:				A TON			ZARDOUS AND MANAGEMENT	
SITE NAME Mc CORMER PAIST WORK CO							TRATION	
2355 Lens ATE Rocking MD 20851					1987 Ha	zardous \	Waste Generation	
2355 61	s AIE K	ecome LID 5082	-				ment Report	
EPAID NO. [MIDIDIO 1312141812715]				FORM]			
rivieno. [i.ib b a a a a a a a a a a				PS			ENT, STORAGE, R RECYCLING	
				ro_			SYSTEMS	
WHO MUST COMPLETE THIS FORM? Form PS must be completed by every site that, during 1987, had one or more hazardous waste								
management systems, existing or under construction, composed of: (1) treatment, storage, disposal, or recycling processes subject to RCRA interim status or permit requirements; or (2) treatment, disposal, or recycling processes exempt from RCRA interim status or permit requirements.								
INSTRI	ICTIONS:	•	tallad fastrua	llane bealant	na na inana 4	of the 10	987 Hazardous Waste	
, morne	orions.	Generation and Mana	gement Repo	rt instructions	booklet before	completing (this form.	
1		Make and complete disposal or recycling					te treatment, storage,	
,	*		hrough IV. Ti	roughout this	form enter "DK"	if the inform	nation requested is not	
		WOME OF SECULARIES	olo, ellier 10	i die mionis	anou radoseran	is not abblic		
Sec. A. Waste treatment, storage, disposel of Instruction Page 57 (20) (20)	recycling system i	description STORE 7	PAINT W	STE IN I	Serms B.	System identi Page 57	fication Number Letter	
Instruction Page 57 Des CALL SOCIETY RESIDU	E AND	SHIP TOO	TOAF			- ·	بكا لكا	
C. On-site T/S/D/R code(s) Page 56	C	Regulatory status code Page 55	E. Operational s Page 58	0	Number of months sy operational during 19		G. Type and number of units Page 59	
S.O.L.P. 1.1. G.9.9.1	P1921	_ _ .	Code	J	Page 59	ľ	Type Number	
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	6 7					62	nt quantity	
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Sec. A Maximum capacity Instruction Page 63 Sec. A Life expectancy Instruction Page 66 NATION Page 66 NATION Page 66 NATION Page 66	B. Operation Page 64	B. Expected change in mand 5 years (through Page ed	C. Limitalik Page 65 1 audinum capacity 1992) WITH BOX C) NING QUESTIC	ns on capacity N/A 2 3 during	D. Commercia code Page 55 D. C. Increase or de Page 66	G. Percent fur available Page 07	E. Percent capacity commercially available Page 85	
Sec. A Maximum capacity Instruction Page 63 Sec. A Life expectancy Instruction Page 60 No. A Life expectancy Instruction Page 60 No. A Life expectancy Instruction Page 60 No. A Life expectancy Instruction Page 60	8. Operation Page 64	B. Expected change in mext 5 years (through Page 60	C. Limitatic Page 65 1	ns on capacity N/A 2 3 during	D. Commercia code Page 55 D. C. Increase or de Page 66	G. Percent fu	E. Percent capacity commercially available Page 85	
Sec. A Maximum capacity Instruction Page 63 Sec. A Maximum capacity Instruction Page 63 Sec. A Life expectancy Instruction Page 66	8. Operation Page 64	B. Expected change in mext 5 years (through Page 60	C. Limitatic Page 65 1	ns on capacity N/A 2 3 during	D. Commercia code Page 55 D. C. Increase or de Page 66	G. Percent fur available Page 07	E. Percent capacity commercially available Page 65	
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*ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE REPORT FOR 1986

CONTRACTOR OF THE PROPERTY OF THE STATE OF THE PROPERTY OF THE

GENERATOR ANNUAL HAZARDOUS WASTE KEPUK
This report is for the calendar year ending December 31, 1986
Read All Instructions Carefully Before Making Any Entries on Form

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EPA Form 8700-13A(5-80) (Revised 11-85)

ENVIRONMENTAL PROTECTION AGENC

Generator ANNUAL Hazardous Waste Report for 1986 (cont.)

This report is for the calendar year ending December 31, 1986

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Generator ANNUAL Hazardous Waste Report for 1986 (cont.)

This report is for the calendar year ending December 31, 1986

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VIII. GENERATOR	S EPA 1.D. NO.	this page were shipped)
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XIV. COMMENTS (enter information by section number-see instructions)

OFFICE OF ENVIRONMENTAL PROGRAMS WASTE MANAGEMENT ADMINISTRATION

Hazardous Waste Generator Waste Reduction Program

-Please complete both sides-

Company: Mc Cormick Paint Works Co	MDD 00ファ4キャプラ
(Name)	MDD 003248275 (EPA ID NUMBER)
Mailing Address: 2355 Lewis Ave. Rockvi (Name) (City	<u>2085</u>) (Zip Code
Location of Generator Site:	from mailing address)
Contact Person: <u>G. Allison</u> (Name)	
(Name)	(Telephone Number)
(Signature)	(Title)
Please provide information about your comp minimization program. (If more space is needed separate sheet of paper and attach it to the quality of the separation in the separation in the separation is separation.	nlesse onswer on a
Is your Company's waste collection system volume of hazardous waste for disposal by separa recyclable materials?	m designed to decrease the ating recyclable from non-
Yes 🗹	No 🗔
Is your Company's waste collection system volume of hazardous waste by keeping hazardous wazardous waste?	m designed to decrease the waste separate from non-
Yes 🗸	No 🗀
If yes, has the system been improved in teduce the amount of hazardous waste for dispose	the past year to further
Yes 🔽	No
	•

What reduction in volume was achieved in the past year?

25% MIN 1

2		S	u	b	s	t	i	t	u	t	i	0	n

Has your Company substituted a hazardous material	with	a non-
hazardous or less hazardous material to reduce either the	e amou	int or
toxicity of hazardous waste generated by your operation?		

Yes No 🗹

If yes, when was the substitute introduced, and to what extent has it reduced the toxicity or amount of hazardous waste generated in the last year?

3. Efficiency

Has your Company improved the efficiency of its operations so as to make a waste stream that was sent off-site for disposal available for recycling?

Yes No

If yes, please describe the improvement and state when it was instituted.

1964-85 RECYCLED 100% WASH WATER

Has your company improved the efficiency of operation so as to reduce the amount of hazardous waste generated?

Yes V No

If yes, please describe the improvement and state when it was instituted.

84-85 LARGER BATCHES WHERE POSSIBLE
LESS WATER OR SOLVENT FOR CLEANUP
PER UNIT PRODUCED "TO TOTAL TOTA

JPH 12 1987

What amount of waste reduction was achieved in the last year?

25% MIN

4. Recycling on-site

Does your Company's waste reduction program include a hazardous waste recycling operation on-site?

Yes No No

If yes, please briefly describe the recycling operation and state when it was instituted.

RECYCLE WASH WATER

What amount of waste reduction was achieved in the last year?

25% へい

4A. Recycling off-site

Does your Company's hazardous waste reduction program include use of an off-site recycling service?

Yes No 🗹

If yes, please describe the recycling service that you use and state when its use was initiated.

What amount of waste reduction was achieved by use of the off-site recycling services last year?

5. Treatment on-site

Does your Company's hazardous waste reduction program include onsite waste treatment which minimizes the toxicity or amount of hazardous waste generated?

Yes 🗹 No 🗌

If yes, please briefly describe the treatment operation and state when it was instituted.

SOLVENT SEPARATED & RECYCLED
SLUDGE SOLIDIFIED
1983

To what extent has the treatment operation reduced toxicity or reduced the amount of hazardous waste generated in the past year?

JAN 19 JOHT Hazardous Waste Division

Page 1 of .

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1985

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. •	G. ALLISON TD. SECTREAS. (1880)	4.1
8 x 1	Print/Type Name Title Signature of Authorized Representative Date Signed	1965 A

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS Generator Annual Hazardous Waste Report (cont.) This report is for the calendar year ending December 31, 1985

This report is for the calen	VIII. FACILITY NAME (specify facility to which all waster in.
Date rec'd:Rec'd by:	this page were shipped)
VII. GENERATOR'S EPA I.D. NO.	CHEMICAL WASTE MINNAGEMENT INC
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IX. FACILITY'S EPA 1.D. NO.	EMELLE
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	and FPA elementation numbers of all transporters whose services were used at an supplemental sheets.] LIALISTS INC. NYD 088658646
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XIII. COMMENTS (enter information by section number—see instructions)

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1984

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GALLISON T.D. SECTREAS	1/24/85
Print/Type Name Title Signature of Authorized Representative	Date Signed

Page 1 of 2

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1984

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MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS GENERATOR ANNUAL HAZARDOUS WASTE REPORT

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This report is for the calendar year ending December 31,- 1983

MARYLAND OFFICE OF ENVIRONMENTAL PROGRAMS Generator Annual Hazardous Waste Report (cont.) This report is for the calendar year ending December 31, 1983

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XIII. CO	DMMENTS tenter information by section number	—see	instructions)		

APPENDIX D

9426 Stewartown Road Post Office Box 2127 Gaithersburg, Maryland 20879 (301) 948-4000

January 11, 1984

Mr. John Kershner, Regional Inspector Maryland State Waste Management Administration Enforcement Division 201 West Preston Street Baltimore, Maryland 21201

Dear Mr. Kershner:

This letter is in reference to your request for information concerning empty drums, marked hazardous waste, that were on one of our construction compounds located near Snouffer School Road in Gaithersburg.

- 1) The drums were obtained from McCormick Paint Works Company in Rockville, Maryland.
 - 2) The drums were empty when we obtained them.
- 3) The drums were to be used for mixing cement, storing water for the mixing of mortar and for trash.
- 4) These drums had not as yet been used by Kettler Brothers.
- 5) The drums were left on the exterior of a new compound we were building for storage.

Should you need any additional information, please feel free to contact me.

Very truly yours,

Richard G. Hines Vice President

Residential Construction

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ENFORCEMENT DIVISIONS

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ENFORCEMENT FILE 'FILE COPY ONLY



2355 LEWIS AVENUE • ROCKVILLE, MARYLAND 20851-2391 • 301 770-3235

January 6, 1984

State of Maryland
Department of Health & Mental Hygiene
Office of Environmental Programs
201 West Preston Street
Baltimore, Md. 21201

Carlo Carretto Carlo San Carlo

Dear Sirs,

This letter is in reply to the R.C.R.A. incident report/
Montgomery County dated 12/14/83 in which empty drums marked with
a hazardous waste label were found 50 yards south of Snouffer School
Road & Chelsea Knoll Drive intersection and approximately 1000 ft.
from the roadway.

After an inspection of our facility by Regional Inspector Mr. John Kershner, I accompanied him to the site of the complaint. Fifteen empty drums, seven of which had a yellow hazardous waste label attached, were lying just outside a newly graded and fenced area in the middle of a large open field. There was no evidence of any material being spilt from the drums. While we were marking these drums (from 1-15) for storage at our plant in Rockville (for State inspection purposes) a truck belonging to Kettler Brothers Inc. (builders) pulled up and the driver asked if this site was the new storage yard for Kettler Brothers. Unable to answer we loaded the empty drums on our truck and brought them back to our plant for safekeeping.

In our manufacturing process and hazardous waste handling program we have an area of empty drums that are not suitable for re-use for one reason or another. Occasionally local builders will request to use some of these old drums for trash drums, mixing cement etc. on construction sites. These particular drums had been given to Kettler Brothers some time previously, at no charge. The location that they were found is Kettler Brothers new starage yard that is just being developed to replace their recently closed yard located on Goshen Road.

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During our hazardous waste handlings we found it more economical to ship solid waste rather than liquid waste to the facility at Emelle, Alabama. Several drums of liquid waste were transfered to other drums to be solidified and the empties after being scraped clean were placed in among the drums not to be used again. Unfortunately the hazardous labels were 'not removed. These were some of the empty drums Kettler Brothers were given the last time they needed drums.

We have since inspected our (unfit for re-use) empty drum storage area and found several more with hazardous waste labels on them. We have removed all labels from these drums and will make sure no empty drums leave our plant with labels on them. Hazardous waste labels will be affixed immediately we commence to solidify waste in a given drum, not before, and without waiting for that drum to be totally filled. All other empty drums will be triple rinsed.

I have asked Mr. Richard Hines, Vice President of Residential Construction of Kettler Brothers, Inc. to write to you confirming the fact that they do pick up empty drums from us on occasion and outline what they use them for.

I hope that his letter along with mine will resolve this incident to the States satisfaction. All of the employees of McCormick Paint Works Company are aware of the need to operate in an environmentally sound manner and will work diligently to make sure incidents like this one are not repeated. Kettler Brothers was in ho way responsible for this incident, the fault being entirely McCormick Paint Works Company's.

Yours sincerely,

Gordon Allison Sec/Treas.

Technical Director

GA/jrc

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FEB 3 1984

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State of Maryland Department of the Environment Hazardous and Solid Waste Management Administration 2500 Broening Highway, Baltimore, Maryland 21224

Report of Observations

Type of Inspection/Observation	ns: <i>RCL</i>	A Follow -UI	<i>o</i> ·	Date 0/ 128 19/
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FEB. 6 1991

February 1, 1991

HSWMA ENFORCEMENT PROGRAM

Mr. Nigussie Retta
Public Health Engineer
Department of the Environment
Hazardous and Solid Waste Management Administration
State of Maryland
2500 Broening Highway
Baltimore, Maryland 21224

Dear Mr. Retta:

This letter is in response to your inspection report of January 10, 1991, to this office requesting information about the market for a finished product made from recycled solvent, dike for storage area and employees' training to handle controlled hazardous substances.

Mr. Retta inspected McCormick Paint Works Company on December 27, 1990; January 2, 1991; January 10, 1991; January 16, 1991 and January 28, 1991. During your inspection I told you about the satellite accumulation of recycled solvent and recycled solvent sludge. We are using recycled solvent (S10) on a daily basis in our paint in place of mineral spirits, which is a raw material for that paint. We have made alkyd paint for our own use for painting our tanks and drums (gray color) from recycled solvent sludge. I also demonstrated to you that with the help of the ACS computer, we can tint to any color. We are also able to make red oxide primer. We supplied our recycled paint to the Loading Dock. The Loading Dock issued us a certified recycled award and letter. Copies of award and letter are enclosed with this letter. Also S10 MSDS are enclosed.

What is recycled solvent? Tank washing with mineral spirits is a principal source of generated recycled solvent. Mineral spirits is a raw material for oil base paint.

We say that recycled solvents are not solid waste when recycled. We can demonstrate this in a couple of ways:

- 1. We are using recycled solvent from previous batches in the new batch of paints as S10 in place of mineral spirits.
- 2. If recycled solvent is a dark color, then we leave the drums of recycled solvent for settling. After about 30 days we use the top portion in place of mineral spirits in dark color paint. The recycled sludge we will use for red oxide primer, exterior wood stain or drum gray paint.



Mr. Nigussie Retta Page Two February 1, 1991

- 3. We use recycled solvent for washing tanks.
- 4. Recently we have made 50 gal of gray alkyd paint from 30 gal recycled solvent sludge. We are using this paint for painting tanks and drums. Formulation is enclosed.
- 5. We have made a laboratory batch of red oxide primer from recycled solvent sludge for steel structures (Type I red oxide shop paint SSPC-Paint 15). Several companies are selling this type of red oxide primer. (Specification enclosed)
- 6. We are using dark recycled solvent in our exterior wood stains. This is standard production for our company. Color card is enclosed.

Now there is a question about the containment system. As per Mr Retta's instructions, we made a dike area in our warehouse #3. Map, design and location are enclosed with this letter. This will be our storage area for recycled solvent with an accumulation of less than 90 days. Raw materials are protected by means of a dike. Containment has a sufficient capacity to contain more than 10% of the volume of containers. The containment has impervious ground. At this time, we have only 9 drums of recycled solvent without settling.

McCormick Paint's goal is zero waste. A large portion of the waste contains the same makeup as raw materials and the paints made. Tank washing is a principal source of generated recycled solvent. Everyone must be responsible for identifying and carry out waste minimization goal. Good house keeping is the easiest and often most inexpensive way to reduce waste. We are also eliminating tank cleanup in between two batches.

Future steps include segregating the solvent wash, so it can be used in the next batch of similar paint. Another project is to develop more formulation for inexpensive metal and wood primers that use some of the waste sludge. We are convincing employees to use a minimum amount of solvent to clean mixers and holding tanks was not easy. Employees were instructed to reuse recycled solvent until finished.

Mr. Nigussie Retta Page Three February 1, 1991

The last question about employees training to handle controlled hazardous substances. Ms. Karen Glantschnig, Safety Coordinator will explain to you in a separate letter.

If you need any additional information, please feel free to contact us. Thank you for your cooperation.

Sincerely,

Shi B. Kaun

Shri B. Kansal Chief Chemist

Enclosures
SBK:bb

APPENDIX E

